

1 **PA Compact Commission**

2 **Title of Rule:** Compact Privilege

3 **History of Rule:** Drafted December 15, 2025

4 **Reason for Rule:** To establish the eligibility for a compact privilege and create the process
5 for a PA to apply for a compact privilege in a remote state pursuant to
6 Section 4 of the Compact Model Language.

7 **Effective Date:**

8 **Chapter 3:** Compact Privilege

9 **Authority:** Section 4: Compact Privilege

10 Section 7: Establishment of PA Compact Commission

11 Section 9: Rulemaking

12 All citations are to the Compact Model Language.

13 **3.0 Purpose:**

14 Pursuant to Section 4 of the Compact Model Language, the PA Compact Commission shall
15 promulgate applicable rules for a Licensee to exercise a Compact Privilege. This Rule will
16 become effective upon adoption by the PA Compact Commission as provided in Section 9 of the
17 PA Compact.

18
19 **3.1 Definitions:**

20 (a) **"Adverse Action"** means any administrative, civil, equitable, or criminal action permitted by
21 a State's laws which is imposed by a Licensing Board or other authority against a PA
22 License or License application or Compact Privilege such as License denial, censure,
23 revocation, suspension, probation, monitoring of the Licensee, or restriction on the
24 Licensee's practice.

25 (b) **"Compact"** means the PA Licensure Compact.

26 (c) **"Compact Privilege"** means the authorization granted by a Remote State to allow a
27 Licensee from another Participating State to practice as a PA to provide Medical Services
28 and other licensed activity to a patient located in the Remote State under the Remote
29 State's laws and regulations.

30 (d) **"Criminal Background Check"** means the submission of fingerprints or other biometric
31 based information for a License applicant for the purpose of obtaining that applicant's
32 criminal history record information, as defined in 28 C.F.R. § 20.3(d), from the State's
33 criminal history record repository as defined in 28 C.F.R. § 20.3(f).

34 (e) **"Data System"** means the repository of information about Licensees, including but not
35 limited to License status and Adverse Actions, which is created and administered under the
36 terms of this Compact.

- 37 (f) **"Jurisprudence Requirement"** means the assessment of an individual's knowledge of the
38 laws and Rules governing the practice of a PA in a State.
- 39 (g) **"Licensee"** means an individual who holds a License from a State to provide Medical
40 Services as a PA.
- 41 (h) **"Medical Services"** means health care services provided for the diagnosis, prevention,
42 treatment, cure or relief of a health condition, injury, or disease, as defined by a State's laws
43 and regulations.
- 44 (i) **"NCCPA"** means the National Commission on Certification of Physician Assistants or a
45 successor organization.
- 46 (j) **"Non-participating State"** means a State that has not enacted this Compact.
- 47 (k) **"Participating State"** means a State that has enacted this Compact.
- 48 (l) **"PA"** means an individual who is licensed as a physician assistant in a State. For purposes
49 of this Compact, any other title or status adopted by a State to replace the term "physician
50 assistant" shall be deemed synonymous with "physician assistant" and shall confer the
51 same rights and responsibilities to the Licensee under the provisions of this Compact at the
52 time of its enactment.
- 53 (m) **"PA Licensure Compact Commission," "Compact Commission," or "Commission"**
54 mean the national administrative body created pursuant to Section 7.A of this Compact.
- 55 (n) **"Qualifying License"** means an unrestricted License issued by a Participating State to
56 provide Medical Services as a PA.
- 57 (o) **"Remote State"** means a Participating State where a Licensee who is not licensed as a PA
58 is exercising or seeking to exercise the Compact Privilege.
- 59 (p) **"State"** means any state, commonwealth, district, or territory of the United States.
- 60 (q) **"State of Qualifying License"** means a Participating State where a PA holds a qualifying
61 license and which has been designated as such by the PA for purposes of registration and
62 participation in the Compact.
- 63 (r) **"Terminate"** means the PA chooses to give up their qualifying license for a non-disciplinary
64 reason
65

66 **3.2 Compact privilege administration**

- 67 (a) Participating states are deemed to have assigned to the Compact Commission the following
68 responsibilities in the compact privilege process:
- 69 (1) The Compact Commission shall provide participating states an online application for
70 use by PAs seeking compact privileges through their designated state of qualifying
71 license.
- 72 (2) The Compact Commission shall use information from its data system to facilitate an
73 application for review by the PA's designated state of qualifying license.
- 74 (3) The Compact Commission shall provide and administer a process to collect service
75 fees and state fees from the PA and remit these fees to the participating state boards
76 and the Compact Commission.
77

78 **3.3 Eligibility for compact privilege**

- 79 (a) A PA must meet the following requirements to receive and maintain a compact privilege
80 under the terms and provisions of the Compact:
- 81 (1) Graduated from a PA program accredited by the Accreditation Review Commission
82 on Education for the Physician Assistant, Inc.
 - 83 (2) Holds a current certification from the NCCPA.
 - 84 (3) Has never been found guilty by a court of a felony or misdemeanor offense through
85 an adjudication or by an entry of a plea of guilt or no contest to the charge.
 - 86 (4) Has never had a controlled substance license, permit, or registration suspended or
87 revoked by a State or by the United States Drug Enforcement Administration.
 - 88 (5) Has a unique identifier that is a social security number.
 - 89 (6) Holds an unrestricted License issued by a participating state to provide medical
90 services as a PA.
 - 91 (7) Has had no revocation of any License or limitation or restriction on any License
92 currently held due to an adverse action.
 - 93 i. If a PA has had a limitation or restriction on a License or Compact
94 Privilege due to an Adverse Action, two years must have elapsed from the
95 date on which the License or Compact Privilege is no longer limited or
96 restricted due to the Adverse Action.
 - 97 (8) Notifies the Compact Commission that the PA is seeking the Compact Privilege in a
98 Remote State.
 - 99 (9) Meets any Jurisprudence Requirement of a Remote State in which the PA is seeking
100 to practice under a Compact Privilege and pay any fees applicable to satisfying the
101 Jurisprudence Requirement.
 - 102 (10) Complies with all other state laws and regulations where the patient is located at the
103 time service is rendered.
 - 104 (11) Complies with each remote states' laws and regulations related to supervision by or
105 collaboration with a physician.
 - 106 (12) Complies with each remote states' laws and regulations related to authority to
107 prescribe controlled substances for each remote state in which the PA seeks
108 authority to prescribe controlled substances.
 - 109 (13) Reports to the Commission any Adverse Action taken by a non-participating State
110 within thirty (30) days after the action is taken.

112 **3.4 Compact participation process**

- 113 (a) To apply for a Qualifying License a PA shall:
- 114 (1) Submit an online application through the Compact Commission's data system along
115 with a sworn statement attesting to the truthfulness and accuracy of all information
116 provided by the applicant.
 - 117 (2) At the time of application designate a Participating State as the state of qualifying
118 license for purposes of eligibility for a compact privilege through the Compact if the
119 PA possesses a full and unrestricted license to conduct medical services in that
120 Participating State.

- 121 (3) Regardless of the participating state selected as the state of qualifying license, the
122 PA shall provide the Commission the primary residence address and consent to
123 service of process by mail at the primary residence address under Section 5(A)(2) of
124 the Compact. A change of primary residence address shall be reported to the
125 Commission within thirty (30) days of the change.
- 126 (4) Submit to a criminal background check within 60 days of the application through the
127 process designated by the state of qualifying license which will include the
128 submission of fingerprints or other biometric based information.
- 129 (5) Sign an attestation that the applicant is unaware of any pending investigation of the
130 current qualifying license at the time of the application.
- 131 (6) Submit any other information requested by the state of qualifying license regarding
132 any unusual circumstances related to the application under review in accordance
133 with compact requirements.
- 134 (7) Pay the nonrefundable fees required by the state of qualifying license and the
135 Compact Commission.
- 136
- 137 (b) When the state of qualifying license receives the application through the Compact
138 Commission that state shall:
- 139 (1) Evaluate the PA's eligibility for participating in the compact privilege process under
140 the criteria set forth in Section 4 of the Compact Model Legislation;
- 141 (2) Review the submitted criminal background check pursuant to Public Law 92-544 as
142 required by the terms and provisions of the Compact; and
- 143 (3) Issue notice, through the data system, to the Compact Commission verifying the PA's
144 eligibility to participate in the Compact and confirming that the state will serve as the
145 state of qualifying license or denying the PA's eligibility to participate in the Compact
146 in accordance with Rule 3.9.
- 147
- 148 (c) Upon notice from the Compact Commission of eligibility approval by the state of qualifying
149 license, to apply for a compact privilege the PA shall:
- 150 (1) Complete the registration process established by the Compact Commission.
- 151 (2) Identify the remote state(s) for which a compact privilege is requested.
- 152 (3) Follow the remote state(s) laws, regulations, and practice requirements and submit
153 any proof of compliance requested by said remote state(s).
- 154 (4) Pay the non-refundable compact privilege fee required by the remote state(s) and
155 any additional administrative fee required by the Compact Commission.
- 156
- 157 (d) Upon receipt of all fees required, receipt of the information from the applicant including any
158 specific requirements of the remote state(s), and verification of eligibility by the designated
159 state of qualifying license, the remote state(s) shall issue a compact privilege to the PA, and
160 provide information regarding the privilege to the Compact Commission to maintain in the
161 data system as set forth in Rule 4.
- 162

163 (e) Any PA information collected by the Commission with the application submitted in this
164 subsection shall be accessible to all participating states, except as otherwise specified in
165 Rule 4 on Compact Data System, Confidentiality, and Information Sharing.
166

167 **3.5 Compact privilege cycle and continued participation**

168 (a) A compact privilege shall be valid until the expiration or revocation of the qualifying license
169 used to apply for the privilege unless the privilege is terminated pursuant to an adverse
170 action or the qualifying license is voluntarily terminated by the PA. The expiration date of the
171 qualifying license shall be the expiration date that was in effect on the date the PA applied
172 for the compact privilege. Any renewal of the qualifying license does not automatically renew
173 the compact privilege. The PA must follow the procedure set forth in this Rule, in accordance
174 with Section 4.A of the model legislation, in order to maintain any existing compact
175 privilege(s).
176

177 (b) Not less than 60 days prior to the expiration of a compact privilege, the Compact
178 Commission shall notify the PA by e-mail of the pending expiration of the compact privilege(s)
179 and provide information that the PA may reapply for any compact privileges pursuant to this rule.
180 The e-mail notice shall be sent to the e-mail address currently on-file with the Commission in its
181 data system. The PA is responsible for renewing any compact privilege(s) prior to their
182 expiration and for maintaining current contact information, including an e-mail address, with the
183 Commission.
184
185

186 (c) When the state of qualifying license processes a complete renewal for the PA, the state of
187 qualifying license shall:

- 188
- 189 (1) Determine that the PA has not been found guilty by a court of a felony or
190 misdemeanor offense through an adjudication or by an entry of a plea of guilt or no
191 contest to the charge;
 - 192 (2) Issue notice, through the data system, to the Compact Commission verifying or
193 denying the PA's eligibility to continue participation in the Compact.
194

195 (d) Upon notice from the Compact Commission of continued eligibility approval by the state of
196 qualifying license, to apply for compact privilege(s) the PA shall:

- 197
- 198 (1) Identify the remote state(s) for which a compact privilege is being requested.
 - 199 (2) Follow the remote state(s) laws, regulations, and practice requirements and submit
200 any proof of compliance requested by said remote state(s).
 - 201 (3) Pay the non-refundable compact privilege fee required by the remote state(s) and
202 any additional administrative fee required by the Compact Commission.

203 (e) Any PA information collected by the Commission with the application submitted in this
204 subsection shall be made available to all participating states. The commission, data system,

205 and other participating states shall not receive or maintain any criminal background check
206 results obtained by participating states.

207

208 **3.6 Voluntary termination of a qualifying license**

209 (a) If the PA voluntarily terminates their qualifying license through which they applied for
210 their current compact privilege(s) and that qualifying license has not yet expired, the
211 voluntary termination ends their licensure in the state of qualifying license and
212 terminates all compact privileges as of the date of termination, unless the PA selects a
213 new state of qualifying license prior to terminating the current qualifying license by
214 following this process:

215 (1) Submit an online application through the Commission's website,

216 (2) Pay a non-refundable fee as set by Rule X.X,

217 (3) Meet the requirements of paragraph 2.1 with the new state of qualifying
218 license,

219 (4) complete a criminal background check pursuant to Public Law 92-544 within
220 60 days of the application and

221 (5) Sign an attestation that the applicant is unaware of any pending investigation
222 of the current qualifying license at the time of the application.

223 (b) Upon application under subsection (a), the new state of qualifying license shall
224 complete the requirements under Rule 3.4(b),

225 (c) Any PA information collected by the Commission with the application to select a new
226 state of qualifying license shall be distributed to all participating states. The
227 commission, data system, and other participating states shall not receive or maintain
228 any criminal background check results obtained by participating states.

229 (d) - Upon approval of a new state of qualifying license, any existing compact privilege(s)
230 held shall terminate and the PA will apply for new privilege(s).

231

232

233

234 **3.7 Withdrawal of applications**

235 (a) An application for a qualifying license shall be considered opened from the date the
236 application form is received by the state of qualifying license.

237 (1) If the PA does not submit all requested materials, including any required fees, within
238 60 days after the application is opened, then the application shall be deemed incomplete
239 and to have been withdrawn.

240 (2) The PA must reapply and submit a new application and new nonrefundable
241 application fees as determined by the state of qualifying license and the Compact
242 Commission.

243 (b) An application for a compact privilege shall be considered opened from the date the
244 application form is received by the remote state(s).

245 (1) If the PA does not submit all requested materials, including any required fees, within 60
246 days after the application is opened, then the application shall be deemed incomplete
247 and to have been withdrawn.

248 (2) The PA must reapply and submit a new application and new nonrefundable application
249 fees as determined by the remote state(s) and the Compact Commission.
250

251 **3.8 Jurisprudence requirement**

252 (a) If a member state has a jurisprudence requirement to be eligible to obtain a compact
253 privilege in accordance with Section 4.A.11 of the Compact, the PA must have successfully
254 taken and passed any jurisprudence requirement prior to being issued a compact privilege
255 in the remote state.
256

257 (b) Jurisprudence requirements satisfied prior to the expiration date of the compact privilege
258 in that remote state shall be considered valid so long as the PA applied for a renewal of
259 the compact privilege prior to the privilege expiration date unless the remote state has a
260 jurisprudence requirement for renewal.
261

262
263 (c) If a compact privilege expires and the PA fails to make an application for another compact
264 privilege in the same remote state prior to the compact privilege expiration date, all
265 applicable requirements for completion of a jurisprudence requirement will apply.
266

267 **3.9 Denial or withdrawal of the determination of eligibility**

268 (a) If the member state selected as the state of qualifying license issues a notice to the
269 Compact Commission denying the applicant's eligibility for the compact in accordance with
270 Section 4.A of the Compact and Rule 3.3, the PA may appeal such determination. The
271 appeal shall be filed with the member state that issued the denial and shall be subject to the
272 laws of that state.
273

274 (b) If the member state selected as the state of qualifying license issues a notice to the
275 Compact Commission approving the PA's eligibility for the compact and thereafter withdraws
276 the approval due to the PA not meeting the Compact's eligibility requirements, any compact
277 privilege issued under that qualifying license shall automatically be cancelled with no action
278 required by any member state. The Compact Commission shall provide e-mail notice of the
279 withdrawal to all member states where a privilege has been issued and to the PA along with
280 notice that all issued compact privileges have been cancelled. The PA may appeal the

281 withdrawal of eligibility. The appeal shall be filed with the member state that issued the
282 denial and shall be subject to the laws of that state.
283

284 **3.10 State of emergency rule – waiver of timeframes**

285 (a) This rule is effective upon a declaration of a national emergency by the President of the
286 United States and/or a declaration of emergency by one or more Governors of the compact
287 member states in response to Force Majeure such as a pandemic, hurricane, tornado,
288 earthquake, or other natural disaster. As such time, each Participating State or the Executive
289 Committee of the Compact Commission has the authority to temporarily waive enforcement
290 of the timeframes in this rule which are not statutorily required.

291
292 (b) Such waiver would be justified based upon:

- 293 (1) The degree of disruption to procedures or timeframes under this rule, which is the
294 basis for the waiver;
295 (2) The degree of benefit (or detriment) of such waiver to the PA and/or public health;
296 and
297 (3) The anticipated duration of the emergency.

298
299 (c) The length of the waiver is subject to the length of the national/state emergency declaration
300 unless preemptively concluded by a majority vote of the Compact Commission.