

1 **PA Compact Commission**

- 2 **Title of Rule:** Compact Privilege
- 3 **History of Rule:** Drafted December 15, 2025
- 4 Adopted at public meeting on April 6, 2026
- 5 **Reason for Rule:** To establish the eligibility for a compact privilege and create the process
- 6 for a PA to apply for a compact privilege in a remote state pursuant to
- 7 Section 4 of the Compact Model Language.
- 8 **Effective Date:** May 31, 2026
- 9 **Chapter 3:** Compact Privilege
- 10 **Authority:** Section 4: Compact Privilege
- 11 Section 7: Establishment of PA Compact Commission
- 12 Section 9: Rulemaking
- 13 All citations are to the Compact Model Language

14 **3.0 Purpose:**

15 Pursuant to Section 4 of the Compact Model Language, the PA Compact Commission shall

16 promulgate applicable rules for a Licensee to exercise a Compact Privilege. This Rule will

17 become effective upon adoption by the PA Compact Commission as provided in Section 9 of the

18 PA Compact.

19

20 **3.1 Definitions:**

- 21 (a) **"Adverse Action"** means any administrative, civil, equitable, or criminal action permitted by
- 22 a State's laws which is imposed by a Licensing Board or other authority against a PA
- 23 License or License application or Compact Privilege such as License denial, censure,
- 24 revocation, suspension, probation, monitoring of the Licensee, or restriction on the
- 25 Licensee's practice.
- 26 (b) **"Compact"** means the PA Licensure Compact.
- 27 (c) **"Compact Privilege"** means the authorization granted by a Remote State to allow a
- 28 Licensee from another Participating State to practice as a PA to provide Medical Services
- 29 and other licensed activity to a patient located in the Remote State under the Remote
- 30 State's laws and regulations.
- 31 (d) **"Criminal Background Check"** means the submission of fingerprints or other biometric
- 32 based information for a License applicant for the purpose of obtaining that applicant's
- 33 criminal history record information, as defined in 28 C.F.R. § 20.3(d), from the State's
- 34 criminal history record repository as defined in 28 C.F.R. § 20.3(f).

- 35 (e) **"Data System"** means the repository of information about Licensees, including but not
36 limited to License status and Adverse Actions, which is created and administered under the
37 terms of this Compact.
- 38 (f) **"Jurisprudence Requirement"** means the assessment of an individual's knowledge of the
39 laws and Rules governing the practice of a PA in a State.
- 40 (g) **"Licensee"** means an individual who holds a License from a State to provide Medical
41 Services as a PA.
- 42 (h) **"Medical Services"** means health care services provided for the diagnosis, prevention,
43 treatment, cure or relief of a health condition, injury, or disease, as defined by a State's laws
44 and regulations.
- 45 (i) **"NCCPA"** means the National Commission on Certification of Physician Assistants or a
46 successor organization.
- 47 (j) **"Non-participating State"** means a State that has not enacted this Compact.
- 48 (k) **"Participating State"** means a State that has enacted this Compact.
- 49 (l) **"PA"** means an individual who is licensed as a physician assistant in a State. For purposes
50 of this Compact, any other title or status adopted by a State to replace the term "physician
51 assistant" shall be deemed synonymous with "physician assistant" and shall confer the
52 same rights and responsibilities to the Licensee under the provisions of this Compact at the
53 time of its enactment.
- 54 (m) **"PA Licensure Compact Commission," "Compact Commission," or "Commission"**
55 mean the national administrative body created pursuant to Section 7.A of this Compact.
- 56 (n) **"Qualifying License"** means an unrestricted License issued by a Participating State to
57 provide Medical Services as a PA.
- 58 (o) **"Remote State"** means a Participating State where a Licensee who is not licensed as a PA
59 is exercising or seeking to exercise the Compact Privilege.
- 60 (p) **"State"** means any state, commonwealth, district, or territory of the United States.
- 61 (q) **"State of Qualifying License"** means a Participating State where a PA holds a qualifying
62 license and which has been designated as such by the PA for purposes of registration and
63 participation in the Compact.
- 64 (r) **"Terminate"** means the PA chooses to give up their qualifying license for a non-disciplinary
65 reason
66

67 **3.2 Compact privilege administration**

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

75 (3) The Compact Commission shall provide and administer a process to collect service
76 fees and state fees from the PA and remit these fees to the participating state boards
77 and the Compact Commission.
78

79 **3.3 Eligibility for compact privilege**

80 (a) A PA must meet the following requirements to receive and maintain a compact privilege
81 under the terms and provisions of the Compact:

- 82 (1) Graduated from a PA program accredited by the Accreditation Review Commission
83 on Education for the Physician Assistant, Inc.
- 84 (2) Holds a current certification from the NCCPA.
- 85 (3) Has never been found guilty by a court of a felony or misdemeanor offense through
86 an adjudication or by an entry of a plea of guilt or no contest to the charge.
- 87 (4) Has never had a controlled substance license, permit, or registration suspended or
88 revoked by a State or by the United States Drug Enforcement Administration.
- 89 (5) Has a unique identifier that is a social security number.
- 90 (6) Holds an unrestricted License issued by a participating state to provide medical
91 services as a PA.
- 92 (7) Has had no revocation of any License or limitation or restriction on any License
93 currently held due to an adverse action.
 - 94 i. If a PA has had a limitation or restriction on a License or Compact
95 Privilege due to an Adverse Action, two years must have elapsed from the
96 date on which the License or Compact Privilege is no longer limited or
97 restricted due to the Adverse Action.
- 98 (8) Notifies the Compact Commission that the PA is seeking the Compact Privilege in a
99 Remote State.
- 100 (9) Meets any Jurisprudence Requirement of a Remote State in which the PA is seeking
101 to practice under a Compact Privilege and pay any fees applicable to satisfying the
102 Jurisprudence Requirement.
- 103 (10) Complies with all other state laws and regulations where the patient is located at the
104 time service is rendered.
- 105 (11) Complies with each remote states' laws and regulations related to supervision by or
106 collaboration with a physician.
- 107 (12) Complies with each remote states' laws and regulations related to authority to
108 prescribe controlled substances for each remote state in which the PA seeks
109 authority to prescribe controlled substances.
- 110 (13) Reports to the Commission any Adverse Action taken by a non-participating State
111 within thirty (30) days after the action is taken.
112

113 **3.4 Compact participation process**

114 (a) To apply for a Qualifying License a PA shall:

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

158 (d) Upon receipt of all fees required, receipt of the information from the applicant including any
159 specific requirements of the remote state(s), and verification of eligibility by the designated
160 state of qualifying license, the remote state(s) shall issue a compact privilege to the PA, and
161 provide information regarding the privilege to the Compact Commission to maintain in the
162 data system as set forth in Rule 4.

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

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168 **3.5 Compact privilege cycle and continued participation**

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

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

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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 (1) Identify the remote state(s) for which a compact privilege is being requested.

198 (2) Follow the remote state(s) laws, regulations, and practice requirements and submit
199 any proof of compliance requested by said remote state(s).

200 (3) Pay the non-refundable compact privilege fee required by the remote state(s) and
201 any additional administrative fee required by the Compact Commission.
202

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 commission rule,

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 **3.7 Withdrawal of applications**

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

235 (1) If the PA does not submit all requested materials, including any required fees, within
236 60 days after the application is opened, then the application shall be deemed incomplete
237 and to have been withdrawn.

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

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

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

246 (2) The PA must reapply and submit a new application and new nonrefundable application
247 fees as determined by the remote state(s) and the Compact Commission.
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249 **3.8 Jurisprudence requirement**

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

254
255 (b) Jurisprudence requirements satisfied prior to the expiration date of the compact privilege
256 in that remote state shall be considered valid so long as the PA applied for a renewal of
257 the compact privilege prior to the privilege expiration date unless the remote state has a
258 jurisprudence requirement for renewal.

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260
261 (c) If a compact privilege expires and the PA fails to make an application for another compact
262 privilege in the same remote state prior to the compact privilege expiration date, all
263 applicable requirements for completion of a jurisprudence requirement will apply.
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265 **3.9 Denial or withdrawal of the determination of eligibility**

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

271
272 (b) If the member state selected as the state of qualifying license issues a notice to the
273 Compact Commission approving the PA's eligibility for the compact and thereafter withdraws
274 the approval due to the PA not meeting the Compact's eligibility requirements, any compact

275 privilege issued under that qualifying license shall automatically be cancelled with no action
276 required by any member state. The Compact Commission shall provide e-mail notice of the
277 withdrawal to all member states where a privilege has been issued and to the PA along with
278 notice that all issued compact privileges have been cancelled. The PA may appeal the
279 withdrawal of eligibility. The appeal shall be filed with the member state that issued the
280 denial and shall be subject to the laws of that state.
281

282 **3.10 State of emergency rule – waiver of timeframes**

- 283 (a) This rule is effective upon a declaration of a national emergency by the President of the
284 United States and/or a declaration of emergency by one or more Governors of the compact
285 member states in response to Force Majeure such as a pandemic, hurricane, tornado,
286 earthquake, or other natural disaster. As such time, each Participating State or the Executive
287 Committee of the Compact Commission has the authority to temporarily waive enforcement
288 of the timeframes in this rule which are not statutorily required.
289
- 290 (b) Such waiver would be justified based upon:
- 291 (1) The degree of disruption to procedures or timeframes under this rule, which is the
292 basis for the waiver;
 - 293 (2) The degree of benefit (or detriment) of such waiver to the PA and/or public health;
294 and
 - 295 (3) The anticipated duration of the emergency.
296
- 297 (c) The length of the waiver is subject to the length of the national/state emergency declaration
298 unless preemptively concluded by a majority vote of the Compact Commission.