



**FEDERATION OF  
STATE MEDICAL BOARDS**

## Criminal Background Checks (CBCs)

### Board-by-Board Overview

- 51 state medical boards (SMBs) conduct criminal background checks on all applicants for initial licensure
- 10 SMBs conduct criminal background checks only for Interstate Medical Licensure Compact (IMLC) applicants
  - 3 SMBs conduct criminal background checks only at their discretion or in certain circumstances
    - 45 SMBs require fingerprints from all applicants for initial licensure
      - 12 SMBs require fingerprints only for IMLC applicants
      - 4 SMBs require fingerprints only in certain circumstances
    - 45 SMBs obtain FBI fingerprint-based criminal history checks on all initial applicants
- 57 boards are in IMLC member jurisdictions: 50 SPL-issuing, 3 non-SPL issuing, and 4 with implementation in process (<https://imlcc.com/>)

**Key:** X = required of all applicants for initial licensure; — = not required; “IMLC only” = required only for physicians applying for licensure through the Interstate Medical Licensure Compact; “Conditional” = required only at the board’s discretion or in certain circumstances; “Not found” = no requirement found in official sources. SPL = State of Principal License (the home state that can issue Letters of Qualification).

| SMB  | IMLC Status                         | Requires CBC for initial licensure | Requires fingerprints | FBI fingerprint-based check | Citation                                      |
|------|-------------------------------------|------------------------------------|-----------------------|-----------------------------|-----------------------------------------------|
| AL   | Member – SPL                        | X                                  | X                     | X                           | <a href="#">Board</a>                         |
| AK   | Member – Implementation in progress | IMLC only                          | IMLC only             | IMLC only                   | <a href="#">Legislation; IMLCC</a>            |
| AZ-M | Member – SPL                        | X                                  | X                     | X                           | <a href="#">Board</a>                         |
| AZ-O | Member – SPL                        | X                                  | X                     | X                           | <a href="#">Board</a>                         |
| AR   | Member – Implementation in progress | X                                  | X                     | X                           | <a href="#">Board</a>                         |
| CA-M | Not a member                        | X                                  | X                     | X                           | <a href="#">Board</a>                         |
| CA-O | Not a member                        | X                                  | X                     | X                           | <a href="#">Board</a>                         |
| CO   | Member – SPL                        | IMLC only                          | IMLC only             | IMLC only                   | <a href="#">Board</a> ; <a href="#">Board</a> |
| CT   | Member – SPL                        | IMLC only                          | IMLC only             | IMLC only                   | <a href="#">Board</a>                         |
| DE   | Member – SPL                        | X                                  | X                     | X                           | <a href="#">Statute</a>                       |
| DC   | Member – SPL                        | X                                  | X                     | X                           | <a href="#">Board</a>                         |
| FL-M | Member – SPL                        | X                                  | X                     | X                           | <a href="#">Board</a>                         |
| FL-O | Member – SPL                        | X                                  | X                     | X                           | <a href="#">Bill analysis</a>                 |
| GA   | Member – SPL                        | X                                  | X                     | X                           | <a href="#">Board</a>                         |
| GU   | Member – SPL                        | IMLC only                          | IMLC only             | IMLC only                   | <a href="#">Board</a>                         |
| HI   | Member – Non-SPL                    | IMLC only                          | IMLC only             | IMLC only                   | <a href="#">Testimony</a>                     |
| ID   | Member – SPL                        | X                                  | X                     | X                           | <a href="#">Board</a>                         |
| IL   | Member – SPL                        | X                                  | X                     | X                           | <a href="#">Board</a>                         |

| SMB  | IMLC Status                         | Requires CBC for initial licensure | Requires fingerprints | FBI fingerprint-based check | Citation                                                |
|------|-------------------------------------|------------------------------------|-----------------------|-----------------------------|---------------------------------------------------------|
| IN   | Member – SPL                        | X                                  | X                     | X                           | <a href="#">Board</a>                                   |
| IA   | Member – SPL                        | X                                  | X                     | X                           | <a href="#">Rule</a>                                    |
| KS   | Member – SPL                        | X                                  | X                     | X                           | <a href="#">Board</a>                                   |
| KY   | Member – SPL                        | X                                  | X                     | X                           | <a href="#">Rule</a>                                    |
| LA   | Member – SPL                        | X                                  | X                     | X                           | <a href="#">Board</a>                                   |
| ME-M | Member – SPL                        | IMLC only                          | IMLC only             | IMLC only                   | <a href="#">Board</a> ; <a href="#">Board</a>           |
| ME-O | Member – SPL                        | IMLC only                          | IMLC only             | IMLC only                   | <a href="#">Statute</a>                                 |
| MD   | Member – SPL                        | X                                  | X                     | X                           | <a href="#">Board</a>                                   |
| MA   | Not a member                        | X                                  | —                     | —                           | <a href="#">Board</a>                                   |
| MI-M | Member – SPL                        | X                                  | X                     | X                           | <a href="#">Statute</a>                                 |
| MI-O | Member – SPL                        | X                                  | X                     | X                           | <a href="#">Board</a>                                   |
| MN   | Member – SPL                        | X                                  | X                     | X                           | <a href="#">Board</a>                                   |
| MS   | Member – SPL                        | X                                  | X                     | X                           | <a href="#">Statute</a>                                 |
| MO   | Member – SPL                        | IMLC only                          | IMLC only             | IMLC only                   | <a href="#">Statute</a> ; <a href="#">Board</a>         |
| MP   | Not a member                        | X                                  | Not found             | —                           | <a href="#">Board</a>                                   |
| MT   | Member – SPL                        | IMLC only                          | IMLC only             | IMLC only                   | <a href="#">Statute</a> ; <a href="#">Proposed rule</a> |
| NC   | Member – SPL                        | X                                  | X                     | X                           | <a href="#">Board</a>                                   |
| ND   | Member – SPL                        | X                                  | X                     | X                           | <a href="#">Board</a>                                   |
| NE   | Member – SPL                        | X                                  | X                     | X                           | <a href="#">Board</a>                                   |
| NH   | Member – SPL                        | X                                  | X                     | X                           | <a href="#">Board</a>                                   |
| NJ   | Member – SPL                        | X                                  | X                     | X                           | <a href="#">Rule</a>                                    |
| NM   | Member – Implementation in progress | X                                  | X                     | X                           | <a href="#">Rule</a>                                    |
| NV-M | Member – SPL                        | X                                  | X                     | X                           | <a href="#">Board</a>                                   |
| NV-O | Member – SPL                        | X                                  | X                     | X                           | <a href="#">Board</a>                                   |
| NY   | Not a member                        | —                                  | —                     | —                           | <a href="#">Board</a>                                   |
| OH   | Member – SPL                        | X                                  | X                     | X                           | <a href="#">Board</a>                                   |
| OK-M | Member – SPL                        | X                                  | IMLC only             | IMLC only                   | <a href="#">Board</a> ; <a href="#">Legislation</a>     |
| OK-O | Member – SPL                        | X                                  | X                     | X                           | <a href="#">Board</a>                                   |
| OR   | Not a member                        | X                                  | X                     | X                           | <a href="#">Board</a>                                   |
| PA-M | Member – SPL                        | X                                  | X                     | X                           | <a href="#">Board</a>                                   |
| PA-O | Member – SPL                        | X                                  | X                     | X                           | <a href="#">Board</a>                                   |
| PR   | Not a member                        | X                                  | Not found             | Not found                   | <a href="#">Board</a>                                   |
| RI   | Member – Implementation in progress | —                                  | —                     | —                           | <a href="#">Testimony</a> ; <a href="#">Board</a>       |

| SMB  | IMLC Status      | Requires CBC for initial licensure | Requires fingerprints | FBI fingerprint-based check | Citation                                            |
|------|------------------|------------------------------------|-----------------------|-----------------------------|-----------------------------------------------------|
| SC   | Not a member     | X                                  | X                     | X                           | <a href="#">Board</a>                               |
| SD   | Member – SPL     | X                                  | X                     | X                           | <a href="#">Statute</a>                             |
| TN-M | Member – SPL     | X                                  | X                     | X                           | <a href="#">Board</a>                               |
| TN-O | Member – SPL     | X                                  | X                     | X                           | <a href="#">Board</a>                               |
| TX   | Member – SPL     | X                                  | X                     | X                           | <a href="#">Board</a>                               |
| UT   | Member – SPL     | X                                  | X                     | X                           | <a href="#">Board</a>                               |
| VT-M | Member – Non-SPL | Conditional                        | IMLC only             | Conditional                 | <a href="#">Statute</a>                             |
| VT-O | Member – Non-SPL | Conditional                        | Conditional           | Conditional                 | <a href="#">Statute</a>                             |
| VI   | Not a member     | X                                  | X                     | X                           | <a href="#">Statute</a>                             |
| VA   | Not a member     | Not found                          | Not found             | Not found                   | <a href="#">State study</a> ; <a href="#">Board</a> |
| WA-M | Member – SPL     | X                                  | Conditional           | Conditional                 | <a href="#">Board</a> ; <a href="#">Statute</a>     |
| WA-O | Member – SPL     | X                                  | Conditional           | Conditional                 | <a href="#">Board</a>                               |
| WV-M | Member – SPL     | X                                  | X                     | X                           | <a href="#">Board</a>                               |
| WV-O | Member – SPL     | X                                  | X                     | X                           | <a href="#">Board</a>                               |
| WI   | Member – SPL     | IMLC only                          | IMLC only             | IMLC only                   | <a href="#">Board</a>                               |
| WY   | Member – SPL     | Conditional                        | Conditional           | Conditional                 | <a href="#">Rule</a>                                |

*For informational purposes only: This document is not intended as a comprehensive statement of the law on this topic, nor to be relied upon as authoritative. Non-cited laws, regulation, and/or policy could impact analysis on a case-by-case or state-by-state basis. All information should be verified independently.*

Questions, comments, or corrections? Please contact [advocacy@fsmb.org](mailto:advocacy@fsmb.org).