



PROMISING PRACTICES ON LICENSURE MOBILITY





INTRODUCTION

A key barrier imposed by occupational licensing is the inability of some professionals licensed by one state to work in another state. Varying licensure requirements across the states often inhibit multistate practice and delay licensees from working in their occupations upon relocation to a new state. However, there are options to improve license portability. Some professions have developed model laws or interstate compacts that improve licensure portability nationwide.

Each type of portability initiative has advantages and disadvantages, and all take time and effort to develop and implement. However, thoughtful consideration of the needs of a profession and the consumers it serves is likely to lead to a solution that can gain the support of licensees, licensing boards, the public, and state legislatures. Moreover, by enhancing the ability of licensees to provide services in multiple states, and become licensed quickly upon relocation, license portability initiatives can benefit consumers by increasing competition, choice, and access to services, especially where providers are in short supply.

MULTISTATE PROBLEM SOLVING WITH INTERSTATE COMPACTS

Navigating the various state licensing requirements, rules, regulations and fee structures can present significant challenges for workers.

To address these challenges, states and professions have turned to occupational licensure interstate compacts. These compacts create reciprocal professional licensing practices between states, while ensuring the quality and safety of services and safeguarding state sovereignty. To date, more than 40 states and territories have adopted occupational licensure compacts for nurses, physicians, physical therapists, emergency medical technicians and psychologists.

As a distinctly American invention, interstate compacts promote multistate problem-solving in the face of complex public policy

issues and federal intervention. The Compacts Clause of the Constitution—Article I, Section 10, Clause 3—grants states the authority to enter into interstate agreements to achieve a common purpose.

Interstate compacts do several important things, including:

- Establishing a formal, legal relationship among states to address common problems or promote a common agenda.
- Creating independent, multistate, governmental authorities (such as commissions) that can address issues more effectively than a state agency acting independently could or when no state has the authority to act unilaterally, or beyond its border.
- Establishing uniform guidelines, standards, or procedures for agencies in the compact’s member states.
- Assisting states in developing and enforcing stringent standards, while providing an adaptive structure that, under a modern compact framework, can evolve to meet new and increased demands over time.

Outlined below are key steps to the development process of a regulatory compact. These should be viewed as examples and can be customized as needed.

1 ADVISORY GROUP: Composed of state officials and other critical stakeholders, an Advisory Group examines the realm of the problem, suggests possible solutions, and makes recommendations as to the structure of the compact. Typically, an Advisory Group is composed of about 20 individuals, each representative of various groups and states. An Advisory Group meets one or two times over a period of two to three months, with their work culminating in a set of recommendations as to what the final compact product should look like.

2 DRAFTING TEAM: A Drafting Team pulls the thoughts, ideas and suggestions of the Advisory Group into a draft compact. The Drafting Team, composed of five to eight compact and issue experts, translates the recommendations, as well as their own thoughts and expertise, into a draft compact that will be circulated to state officials for comment. In addition, the document will be open for comments from a wide swath of stakeholders and the public. Following a comment period, the compact will be revised as needed and released to the Advisory Group for final review to ensure it meets the original spirit of the group’s recommendation.

3 EDUCATION: Once completed, the compact would be available to states for legislative approval. During this phase of the initiative, state-by-state technical assistance and on-site education are key to

OCCUPATIONAL LICENSURE COMPACT MEMBERSHIP

Physical Therapy (PT) Compact: AZ, AR, CO, GA, IA, KY, LA, MD, MS, MO, MT, NE, NH, NJ, NC, ND, OK, OR, SC, TN, TX, UT, VA, WA, WV

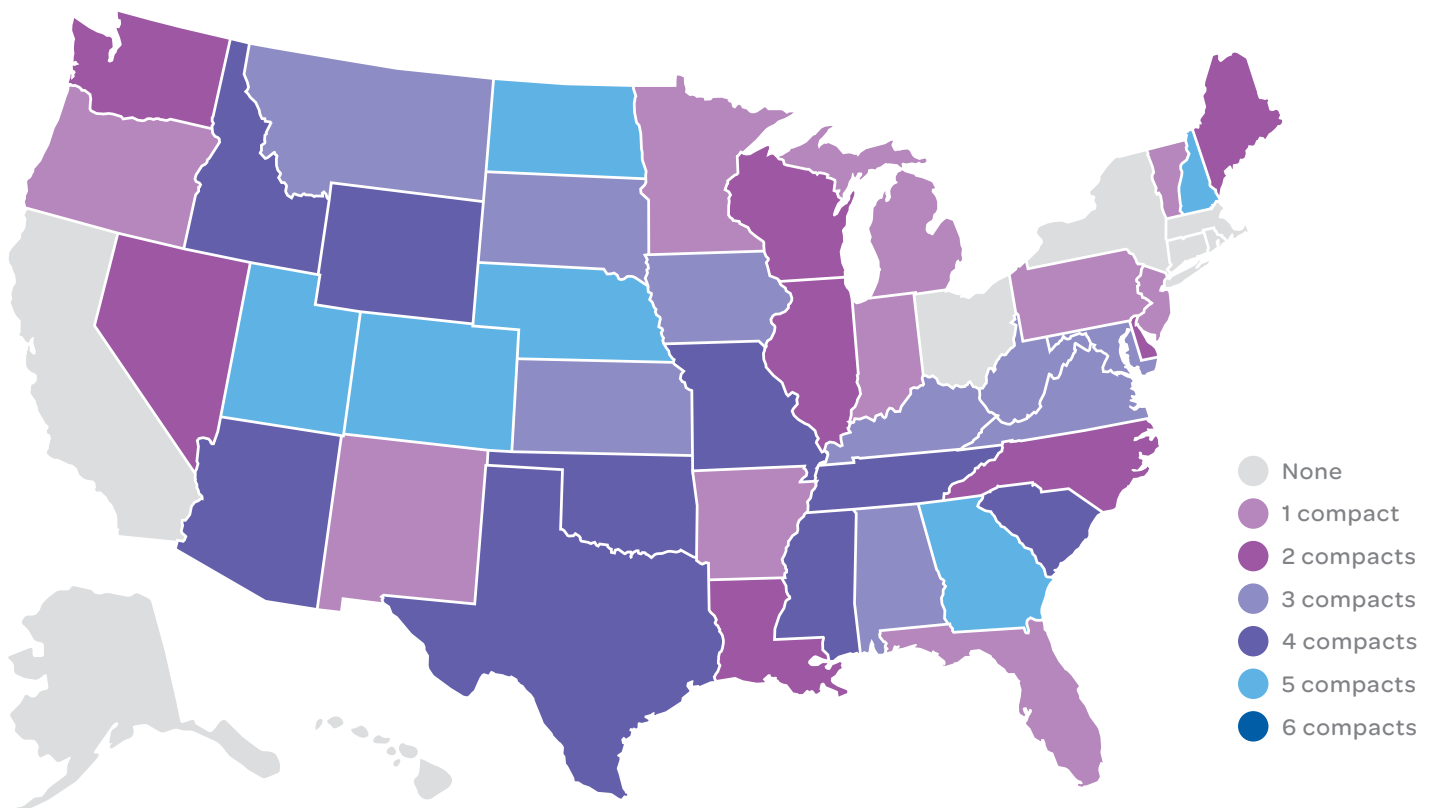
Interstate Medical Licensure Compact (IMLC): AL, AZ, CO, GA, ID, IL, IA, KY, KS, ME, MD, MI, MN, MS, MT, ND, NE, NV, NH, OK, PA, SD, TN, UT, VT, WA, WV, WI, WY, DC, GU

Emergency Medical Technician Compact (REPLICA): AL, CO, DE, GA, ID, KS, MS, MO, ND, NE, NH, SC, SD, TN, TX, UT, VA, WY

Nurse Licensure Compact (NLC): AL, AZ, AR, CO, DE, FL, GA, ID, IA, IN, KS, KY, LA, ME, MD, MS, MO, MT, NE, NH, NM, NC, ND, OK, SC, SD, TN, TX, UT, VA, WV, WI, WY

Psychology Interjurisdictional Compact (PsyPact): AZ, CO, GA, IL, MO, NE, NV, NH, OK, TX, UT

Advanced Practice Nursing (APRN) Compact: ID, ND, WY



THOUGHTS FROM THE IMPLEMENTERS

Interstate compacts are becoming increasingly utilized among professions seeking to increase mobility opportunities for their practitioners. What do the state boards who have entered these compacts have to say about their effectiveness?

“Our compact has made a huge difference to the point that this year we licensed 17 percent more doctors than we did the year before. Twenty percent of the docs we issued licenses to this year were licensed through the compact.”

—Kevin Bohnenblust, Wyoming Board of Medicine

“These compacts are really pretty flexible tools—you can build them to do a variety of different things. What works for one profession, may not be exactly what works for a different profession, but it still fits under the umbrella of a compact approach.”

—Dan Manz, REPLICA

“I think the compact bills were successful because it was a team effort. You had people at the profession who realized that it needed to be done, not only from our nursing board, but nurses with first-hand experience. Same thing with the physical therapists—they wanted this to happen. They saw the benefit for them, so they were engaged.”

—Sen. Barrow Peacock (LA)

“As we get more states involved in the compact, I look at the compact as setting a national standard for EMS, because we’re all doing the same education, verification, all that kind of stuff. So, I think it will be an enhancement to the system.”

—Joe Schmider, Texas EMS Director

“Interstate compacts that are written well are something that everybody can get behind. They are great bipartisan bills because there really is no downside to them. It helps your residents and encourages people to come and work in your state and it allows people in your state to go and work in other states.”

—Sen. Carol Blood (NE)

“What I have found to be the advantage [of a compact] is, number one, that it reduces the burden of multiple licenses, or the burden of regulation. Number two, is I feel like we’re protecting the public, which is always the goal of it. And number three, the statutes give you permission to work more closely with the other states.”

—Joey Ridenour, Arizona State Board of Nursing

“Where I do see benefits is in the sharing of information concerning discipline investigations. So there’s going to be much more conversation, much more discussion, much more collaborative effort between the states on sharing that information so we can all reach an end result of appropriate regulation.”

—Scott Majors, Kentucky Board of Physical Therapy

success. Most state legislators have limited knowledge about interstate compacts, and with such a major issue being addressed, increasing awareness in each state is imperative. Previous interstate compact efforts have convened end-of-the-year legislative briefings for state officials to educate them on the solutions provided by the interstate compact. Education occurs before and during state legislative sessions.

4 ENACTMENT: Most interstate compacts are effective upon contingency. They typically activate when a pre-set number of states join the compact. For instance, the Interstate Medical Licensure Compact was triggered when seven states joined.

5 TRANSITION: Following enactment by the required number of states, the compact becomes operational and, dependent upon the administrative structure placed in the compact, goes through standard start-up activities such as state notification, planning for the first commission or state-to-state meetings, and hiring of staff to oversee the agreement and its requirements if authorized by the compact. A critical component of the transition will be the development of the rules, regulations, forms, standards, etc. by which the compact will operate.

CSG has been involved in the development and implementation of every recent occupational licensure interstate compact, including:

- Interstate Medical Licensure Compact (IMLC)
- Enhanced Nurse Licensure Compact (eNLC)
- Physical Therapist Compact (PTC)
- Emergency Medical Technicians Compact (REPLICA)
- Psychologist Interstate Compact (PsyPact)

State governments often prefer to direct themselves collaboratively when addressing problems that span boundaries, and compacts have proved to be an effective mechanism for states to jointly problem-solve, often avoiding federal intervention. The CSG National Center for Interstate Compacts (NCIC) serves as an information clearinghouse, a provider of training and technical assistance and a primary facilitator in assisting states in the review, revision and

creation of new interstate compacts to solve multi-state problems. CSG is uniquely positioned to offer a full-range of services to states that need not only information and expertise, but also guidance and technical assistance in dealing with interstate compacts and other interstate agreements.

MODEL LAWS/RULES

Model laws were among the earliest initiatives to improve license portability, and they serve many of the same purposes as interstate compacts. The Uniform Law Commission (ULC) says the purpose of a model law is to promote uniformity. Professional associations and associations of licensing boards have used model laws to address occupational license portability.

Unlike interstate compacts, occupational license portability provisions in model laws are often only a small part of a model state practice act that covers all aspects of practice, including scope of practice and disciplinary standards. Adding portability provisions to a model practice act encourages state legislatures to adopt such provisions, and also more uniform licensing requirements. In some cases, portability language is included in model administrative regulations, rather than model laws, encouraging adoption by state licensing boards without legislative action.

One profession that has utilized model law is architecture. Reciprocal licensing in architecture goes back to the 1919 charter of the National Council of Architectural Registration Boards (NCARB). As stated in the charter, a core part of NCARB's mission is "to foster consistent rules and regulations that facilitate interstate practice." The NCARB Certificate, a credential for architects who meet certain education, examination and experience requirements, was first offered in 1937 and is now the primary vehicle for multistate practice. The certificate is accepted in all 55 U.S. jurisdictions. Requirements for certification are set forth in NCARB's model law and model regulations for the practice of architecture, which also encourage adoption of consistent licensing requirements.





MUTUAL RECOGNITION VS. EXPEDITED LICENSURE

Mutual recognition and expedited licensure are the two avenues used in reciprocity initiatives to improve portability. Each model has advantages and disadvantages, and there are distinctions to note with each. Under a mutual recognition model, a licensee only needs one state license, which gives them a privilege to practice in other states that have entered into the initiative. Conversely, reciprocity initiatives based on expedited licensure require application for a license in each intended state of practice, but make the process more efficient than it otherwise would be. Both model laws and interstate licensure compacts have employed these two approaches.

Mutual recognition is a simple, efficient approach for multistate practice. Applicants who meet certain criteria need apply for only a single state license. In general, no additional fees, paperwork, or review is required. The ease of multistate practice under a mutual recognition model may explain why it is favored by a number of professions that frequently use telework or require emergency movements across state lines. While a mutual recognition model provides an efficient mechanism for practicing in multiple states without obtaining multiple licenses, licensees typically must apply for a new license when they move to another state or establish a principal place of business in another state.

Under an expedited licensure approach, multistate practice requires applicants to obtain a license in each state they intend to practice in.

Typically, the process begins when applicants provide their credentials to a central entity for storage and transfer. Administrative officials from the principal state of licensing then determine whether an applicant qualifies for expedited licensure. If qualified, applicants receive an expedited license in other member states. Expedited licensure has been described as the “check the box” approach where you are licensed in one state, and you can choose which other states you would also like to be licensed in. Although the process involves multiple steps, the use of centralized databases for confirming an applicant’s qualifications may reduce paperwork and review time, especially after the initial determination of qualification. Fees, however, may be higher, because payments to each state board and a central administrative body may be required.

Mutual recognition of a single state license poses a lower barrier to cross-state practice than expediting licensure in multiple states, however those who favor expedited licensure tend to emphasize each state’s ability to take adverse disciplinary action under its own license. Because the licensee actually possesses a state license in all states he practices in, rather than just his home state license being recognized, state boards can take disciplinary action against bad actors as they would anyone else who possesses a license in their state. Expedited licensure initiatives assert that their approach strikes the right balance between reducing the burden of multistate licensure and maintaining accountability at the state level.

The nature of a profession and the importance of multistate practice compared to relocation to another state, is the key consideration when choosing a procedure for achieving license portability.

PROFESSION-LED MOBILITY EFFORTS: EXAMPLE FROM ACCOUNTANCY

The issue of licensure mobility of Certified Public Accountants (CPAs) and CPA firms has been of interest to the profession for many years.

In 1997, the American Institute of Certified Public Accountants (AICPA) and the National Association of State Boards of Accountancy (NASBA), added substantial equivalency to the profession's model state accountancy statute. Under Section 23 of the Uniform Accountancy Act (UAA), if a CPA has a license in good standing from a state that utilizes a common CPA certification criterion, then the CPA would be qualified to practice in another state that is not the CPA's principal place of business. The common criteria included in the UAA is 150 hours of education from an approved degree program, one year of accounting experience under a licensed CPA, passage of the uniform CPA examination.

Each state needed to enact and implement the provision in a manner similar to what appeared in section 23 in order for this substantial equivalency to form the rationale for CPAs to serve clients across state lines, as well as give state board of accountancy the ability to protect the public.

Before this effort from AICPA and NASBA, states enacted substantial equivalency provisions with complicated and varying requirements that did little to protect the public interest. The result was a patchwork system of individual state requirements that were inefficient, difficult to navigate, and anything but uniform.

This effort displays the importance of collaboration when pursuing reform that affects so many different stakeholders. AICPA and NASBA,

worked with dozens of state boards of accountancy and state CPA societies to develop this plan that allows clients to receive timely services from the CPA best suited for the job, regardless of geographic location. Mobility also removes the hindrances of unnecessary filings, forms, and increased costs while simultaneously maintaining the state boards' public protection prerogative.

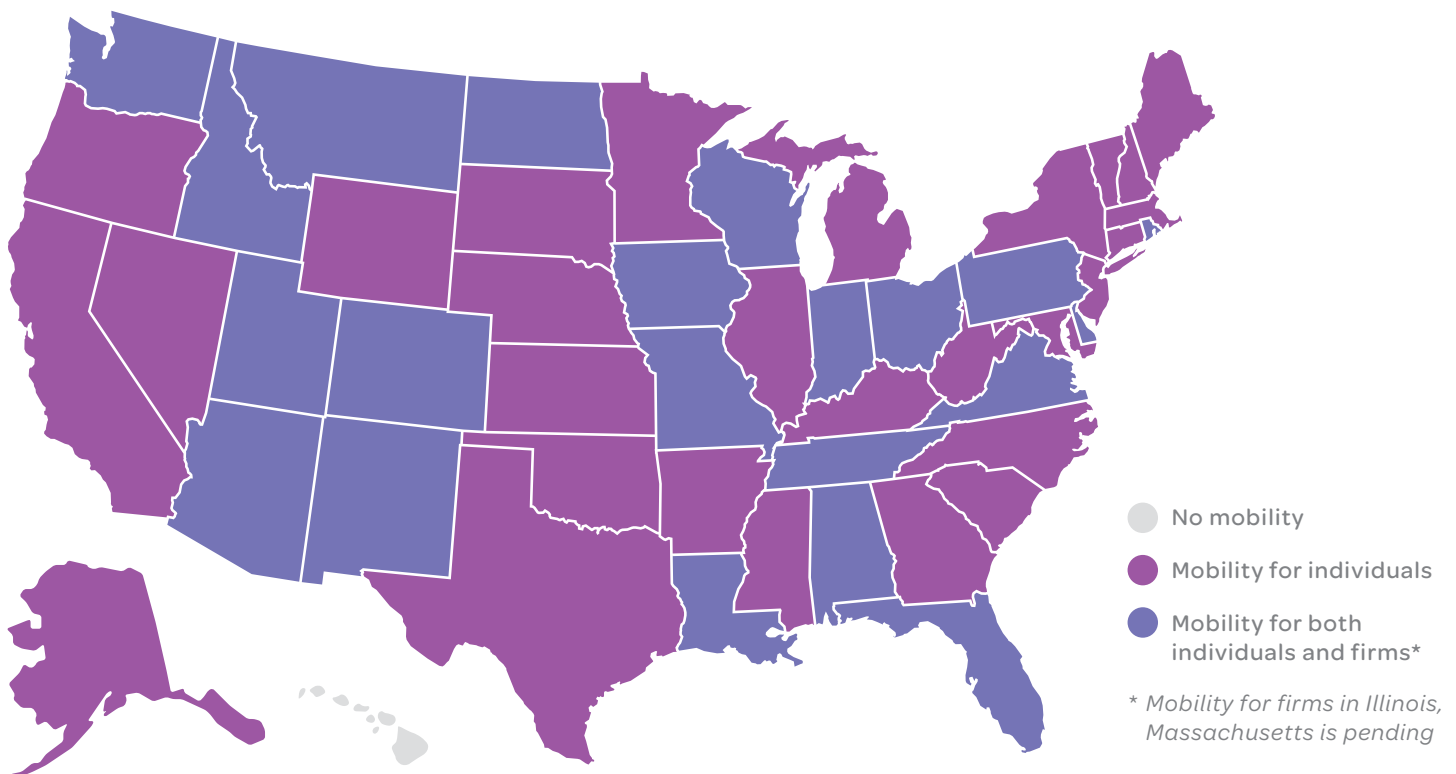
The language added to the UAA gives state boards of accountancy automatic jurisdiction over out-of-state CPAs and firms practicing in their states. A CPA practicing under mobility is automatically subject to the jurisdiction of the state boards without the requirement of an official registration or filing.

AICPA and NASBA wanted to ensure that licensed CPAs were able to practice across state or jurisdictional lines—personally or electronically—as long as they were in good standing in their jurisdiction of principal residence and met the substantial equivalency criteria.

This CPA mobility effort solved a critical need for states to adopt a uniform system that allows fluid practice across state lines. Today's electronic age makes conducting business across state borders an everyday occurrence. Enabling licensed CPAs to provide services across state lines without unnecessary burdens that do not protect the public interest gives the profession greater flexibility to provide services to their clients. Additionally, businesses today are often located in multiple states and have compliance responsibilities in multiple jurisdictions. Compliance and enforcement of the old system would be nearly impossible, with multiple, cumbersome processes and disparities in requirements.

Since 2006, a national effort has been underway to adopt this uniform system that allows licensed CPAs to provide services across state lines. As of May 2014, a total of 50 states and the District of Columbia have passed mobility laws and are now in the implementation and navigation phases.

DOES STATE HAVE CPA MOBILITY FOR INDIVIDUALS?



SOLVING WORKFORCE SHORTAGES WITH MOBILITY: TEACHER LICENSURE RECIPROCITY

States are increasingly looking at how to address teacher shortages. Removing barriers to interstate mobility for teachers could help states fill these shortages. There is a current framework in place for helping out-of-state teachers get their credential in a new state, but it is often burdensome for the displaced teacher. Thirty-five states established differing requirements for experienced and inexperienced teachers, limiting licensure barriers for candidates meeting established experience requirements. Fourteen states require candidates with classroom experience to provide evidence of effectiveness in past performance, oftentimes limiting barriers for candidates who can demonstrate success.

Thirty-one states require that some or all out-of-state teacher candidates take additional coursework or training prior to entering a classroom, or within a certain number of years of teaching. Forty-three states require that some or all out-of-state teacher candidates take additional assessments.

Reciprocity agreements allow states to work through variations in licensing systems to coordinate license transfers and fill vacant teaching positions with qualified candidates. Most states have policies

in place to improve reciprocity for certain teachers, but few states provide full reciprocity for all fully licensed teachers.

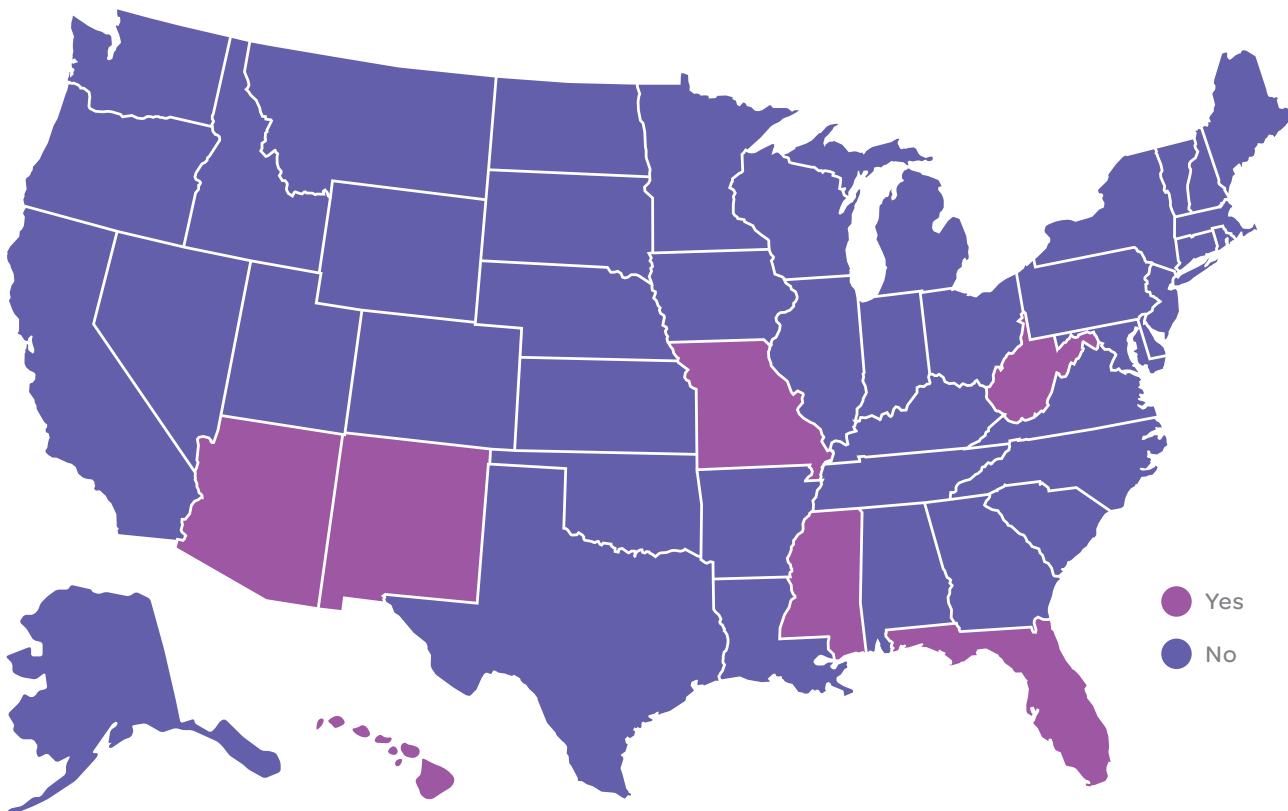
Only eight states offer full teacher license reciprocity for all eligible, fully licensed teachers. In these states, fully licensed out-of-state teachers, regardless of experience, are immediately eligible to receive a standard teaching license and are subject to few or no additional requirements. These states are Arizona, Florida, Mississippi, Missouri, Nevada, New Mexico, Hawaii and West Virginia. Interestingly, these are states that are known as states with significant teacher shortages. These states are using full-reciprocity as a tool to attract new teachers to come and practice in their state.

STREAMLINING DECISION MAKING WITH PRIMARY SOURCE DATA

One practice that many professions are beginning to use to streamline decision making about an individual licensee is utilizing primary source data banks.

Professions recognize that a license is a privilege and not a right. One must earn a professional license and keep this license in good standing throughout their practicing career. From a human resource standpoint, the process of keeping up with licenses can be an incredibly taxing, complex and tedious process, and if states aren't looking in the right place, they could be putting themselves at high risk for

DOES STATE OFFER FULL LICENSURE RECIPROCITY FOR TEACHERS?



MILITARY SPOUSE PROVISION

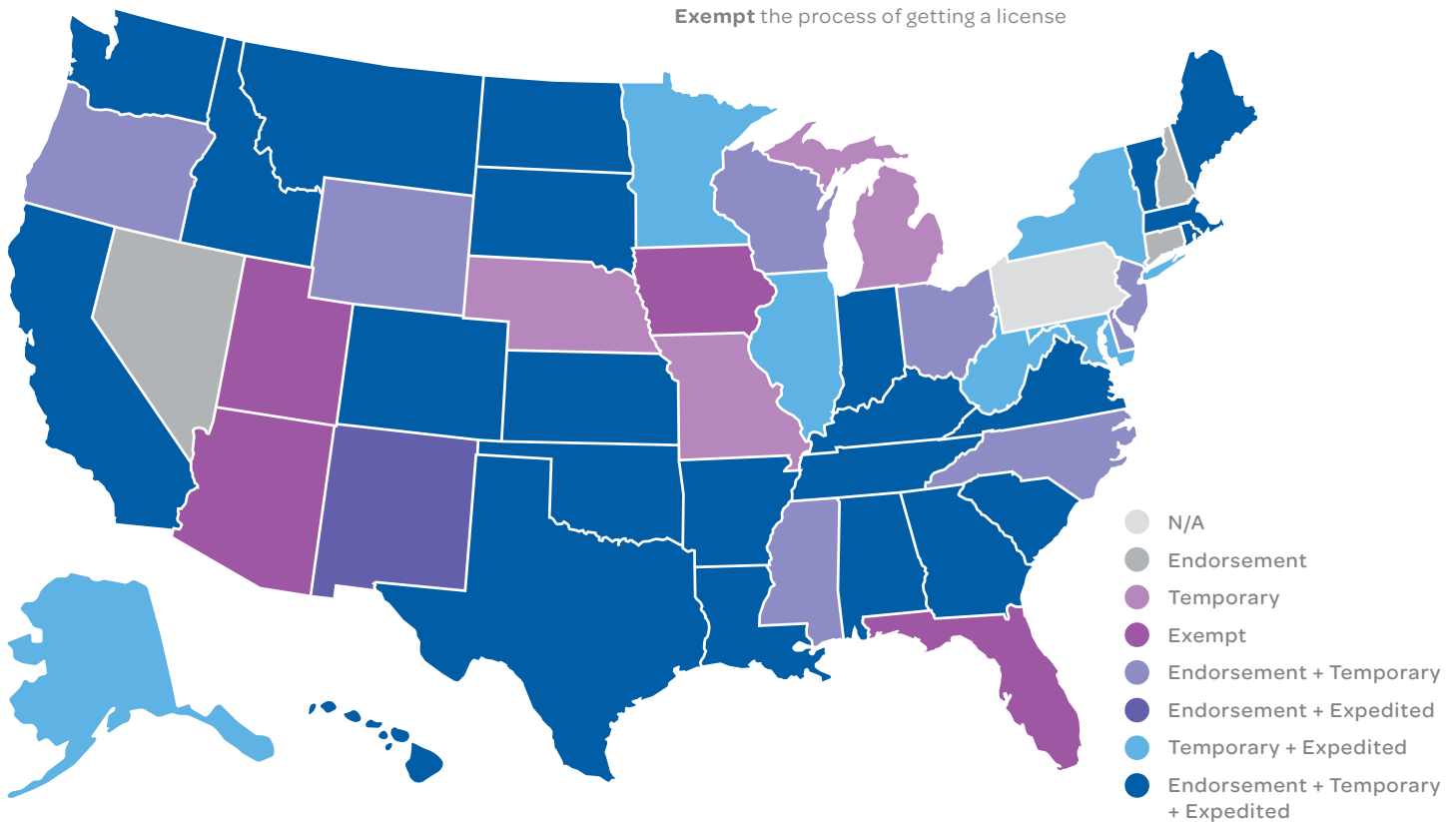
Four Options

Make **endorsement** of existing licenses available and attainable

Provide **temporary** licensing for spouses who cannot qualify for endorsement

Expedite the process of getting a license

Exempt the process of getting a license



non-compliance. So how do state boards verify out-of-state licenses? Many are turning to primary source databanks.

Banking credentials are important for a licensee's future. Credentials are primary source verified, electronically stored and ready to use for licensure applications, job applications, insurance verifications, etc. These data banks store things such as college course catalogs, transcripts, exam scores, licensure information, work experience and specialty training information.

The state licensing board is considered a primary source and will be the single place to verify and monitor for renewal, standing, and in some cases, disciplinary actions taken against the individual and/or his/her license. Professions with a centralized data bank allow any state board to look at any licensee in any state for their license history and examine disciplinary actions, and determine if additional licensure requirements need to be achieved before a new license is issued.

In order to conduct effective compliance monitoring of licenses, validation at appropriate times is essential. When a state board enters a license into the data bank, it will be verified at the primary source. State boards are able to monitor the license across all 50 states.

In addition to checking the license status, identifying any sanctions or disciplinary actions is essential for ongoing monitoring to gain a broader context when issuing a license to an out-of-state applicant. In today's mobile and urban-centric society, having a streamlined process for verifying an out-of-state license that allows moving practitioners to practice sooner is crucial.

DISPROPORTIONATELY AFFECTED POPULATIONS: MILITARY SPOUSES

While the monetary cost of obtaining a license affects everyone working in a licensed occupation, military spouses must spend both time and money on complying with these rules every time they move for the military member's career. This cost is made more difficult to bear for military spouses as many find it difficult or even impossible to secure unemployment compensation while they search for their next job and navigate the licensing process of each state. An awareness of this difficulty may prevent another individual from moving, but military spouses may instead choose to not seek licensure once they move, which can create additional financial strain.

Most states establish and enforce occupational licensing regulations entirely independently of other states, which means that standards can vary widely, even between states with similar population characteristics or within the same region. Military families move an average of once every three years. Following those moves, 73 percent of military spouses are faced with the requirement to reapply for licensure for the occupation or profession in which they already work, according to Rea Hederman and Bryanna Austin in their report *Increasing Job Opportunities for Military Families*.



However, many states have laws to make it easier for military spouses relocating from out of state to carry their occupational licenses to a new state. The following map shows each state's provision for out-of-state military spouses seeking licensure.

Interstate compacts may also provide the means for military spouses to continue working in their profession. For example, military spouses who are psychologists and are licensed in a PSYPACT member state could, in some cases, continue their practice despite relocation, according to PSYPACT's Executive Director Janet Orwig: "If they are licensed in a compact state and they got relocated to another compact state ... they would be able to continue their practice with the people they had in that previous state through telemedicine, so there is the possibility that the compact will help military spouses as they relocate."

LEGISLATIVE APPROACHES TO OCCUPATIONAL MOBILITY

ARIZONA HOUSE BILL 2569

On April 4, the Arizona State Senate passed House Bill 2569, which will allow workers with an out-of-state occupational license to earn immediate reciprocity in the state. Gov. Doug Ducey has long been supportive of such measures and has indicated he will sign the legislation into law.

While similar legislation has been proposed in states such as South Dakota, Arizona's HB 2569 is set to become the first state law that grants automatic reciprocity to all out-of-state licenses for any licensed occupation. HB 2569 is an expansion of an existing reciprocity statute that allows military members and spouses to easily transfer their occupational license or certification into Arizona. The bill's sponsor, Rep. Warren Petersen, points to this measure as proof that licensure reciprocity "can work, at least on a small scale."

Petersen views this bill as an opportunity to "get government out of the way and let [workers] get to work."

There are conditions to reciprocity under this legislation. The licensee must have a license in good standing; have had no adverse action against their license; have no pending investigation(s); have been licensed or certified for a minimum of one year; and have met "minimum education requirements" in their licensing state.

Professional advocacy groups such as the National Board for Certified Counselors, or NBCC, have voiced concerns that "grant[ing] a license even if [the] previous state has much lower licensing requirements," effectively lowers standards for occupational licensure in Arizona, though most of these groups are generally supportive of increased licensure portability.

Rep. Pamela Powers Hannley and others have concerns about the one-year minimum duration of licensure to qualify for reciprocity. Like the NBCC, Hannley worries about the "dumb[ing] down of standards in the name of deregulation," and that HB 2569 is not "judicious and strategic" enough.

Other legislators are supportive of the concept, but worry about the practice. Rep. Amish Shah balks at the use of the term "reciprocity," seeing HB 2569 as a one-way street into Arizona without compromise from other states.

As state legislatures and licensing boards continue to reassess their occupational licensing requirements, a key challenge will be striking a balance that is not overly burdensome on working families while still protecting public health and safety.

UTAH HOUSE BILL 226

Another innovative approach to reducing barriers to occupational mobility is competency-based licensing. Utah Rep. Norm Thurston was the sponsor of recently enacted legislation that provides an alternate pathway to an occupational license based on a demonstration of the knowledge and skills necessary to competently and safely practice a licensed profession. In other words, instead of requiring all applicants to comply with the traditional licensing process, which may include a lengthy training period and final exam, this approach would provide applicants the opportunity to show the licensing authority that they are ready to practice the profession through a proficiency assessment or competency-based program. Thurston said he wanted licensing boards to know that they don't have to be as rigid as they might think they have to be: "As a legislature, we want [the licensing authority] to be more flexible and more compassionate." He explained that, this legislation encourages alternative pathways to occupational licensure— paths where skilled individuals can more quickly and easily demonstrate they are ready to be licensed, "and the division can then waive, for example, an hours requirement or a final exam requirement."

RECENT LICENSURE MOBILITY LEGISLATION

STATE	BILL NO.	STATUS	DESCRIPTION
ALABAMA	HB 388	Enacted	Military Family Jobs Opportunity Act, professional licensing boards required to issue licenses and certificates to military spouses who hold licenses and certificates from other states, required to issue temporary licenses and certificates in certain instances when other state has lesser requirements.
ARKANSAS	HB 1835	Failed	A licensing entity shall by rule adopt the least restrictive requirements for licensing, registration, or certification for a person who was previously licensed in another state in good standing.
ARKANSAS	HB 1255	Introduced	Would require a licensing entity to adopt by rule least restrictive reciprocity requirements for licensing, registration, or certification of a person who demonstrates they were previously licensed to practice in their profession in another state; has a license in good standing; and is sufficiently competent in their profession.
IOWA	HSB 65	Introduced	Would establish an expedited licensing process for spouses of active duty members of the military who are stationed in Iowa pursuant to military orders.
MONTANA	HB 105	Enacted	Requires licensing boards to issue a license to practice without examination to a person licensed in another state, if certain criteria are met.
NEW JERSEY	A 1531	Enacted	Revises provisions relating to the reciprocity for out-of-state professional and occupational licenses. Must give out-of-state license holder a reciprocal license if they have practiced in good standing for five years
NORTH DAKOTA	SB 2095	Enacted	Relates to licensure and reciprocity of cosmetologists, manicurists, and estheticians, provides satisfactory proof of applicant who is licensed in good standing in other state to practice cosmetology, manicuring, or esthetics. Must have worked for 3 out of 5 years, graduated from a cosmetology school, passed exams acceptable to the board.
OKLAHOMA	SB 661	Introduced	Would allow active armed forces or any federal agency personnel, including their spouse, who is licensed in another state to engage in the practice of an occupation or profession regulated by the Oklahoma Statutes without being licensed in this state. Would exempt actively military and their spouses from paying licensing fees.
UTAH	HB 173	Enacted	Modifies the authority of the Division of Occupational & Professional Licensing to issue licenses to individuals who have been previously licensed in another state, district, or territory of the United States for at least one year.
UTAH	SB 227	Enacted	Provides certain exemptions from occupational and professional licensure in a variety of occupations and professions, including for an individual serving in the military or their spouse if the individual has a valid license in another jurisdiction.
VIRGINIA	HB 2352	Enacted	The Board's licensure regulations shall also provide for licensure by reciprocity with comparable endorsement areas for those individuals holding a valid out-of-state teaching license and national certification from the National Board for Professional Teaching Standards or a nationally recognized certification program approved by the Board of Education.
WISCONSIN	SB 108	Enacted	Relating to cosmetology and barbering continuing education requirements and licensure of barbers, cosmetologists, and related professionals from jurisdictions outside Wisconsin.



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