



Analysis

The Uniform Law Commission's Uniform Occupational Licenses of Servicemembers and Military Spouses Act, or UOLSMSA, is a comprehensive approach to service member and military spouse licensure. It does two things: It makes the state's licensing system observable and standardizes credential issuance under the Servicemembers Civil Relief Act. Making state licensing systems more transparent, improving reporting on military-connected applicants and making the licensee's path predictable align with the department's priorities.

What follows walks through the Act in two parts. Information accessibility comes first. It's the part that turns state action into measurable progress and measurable progress into reliable input for federal force-posture decisions.

Some states have enacted some or all of the components of the UOLSMSA. The Defense-State Liaison Office can provide a crosswalk of the Act's requirements to existing state laws for state policymakers, upon their request.

Part I: Information accessibility – primary consideration

The Act establishes a uniform public-reporting framework that every state licensing board should follow. The framework has three components, each addressed in turn below.

1a. Annual data reporting

Each year, every licensure state should publish:

- The number of applications received from service members and military spouses under SCRA-aligned pathways
- The average and median processing times for those applications
- The number of credentials issued
- The number of applications denied

The data should be made available through reasonable electronic means (as further defined within the act). The UOLSMSA directs licensing boards to "take reasonable steps to ensure that resources for applicants under this process are publicized," placing an affirmative duty on the state to put the information in front of the families it is meant to serve, not merely to make it available upon request.

1b. A designated military liaison at each covered licensing board

An existing staff member at each board is named to serve as the single point of contact for military-connected applicants and assist in expediting the application. The contact is identified on the board's public-facing website with a direct phone number and email.

1c. Electronically publicized resources, application information and contact information

Each licensure board broadly publicizes resources for military-connected applicants through a public website or other electronic communication channels used by the state. Applicants can readily access information about the application process, available support services, expected application processing times and the designated board contact available to assist service members and military spouses.

**Why this comes first:**

Federal recognition of out-of-state licenses, established by the December 2024 amendments to the Servicemembers Civil Relief Act, is a legal floor. Without state-level reporting, that floor cannot be measured against the intended demographic it was written for. The DOW cannot tell whether license portability is reaching military-connected applicants. The Government Accountability Office asked the department to build an ongoing, repeatable instrument for measuring whether state actions are improving military spouses' experiences with licensing. The information accessibility provisions within the act help close three important loops:

- **Accountability:** Reporting on applications received, processing times, licenses issued and denials allow the DOW and other stakeholders to assess whether military-connected applicants are receiving the benefits intended by federal and state portability policies.
- **Continuous improvement:** Publicly available metrics create an ongoing, repeatable mechanism for measuring whether state actions are improving licensing outcomes and experiences for military spouses over time.
- **Military basing and quality of life:** Consistent state-level data can be incorporated into military quality of life assessments and other analyses that consider the impact of licensure barriers on military families.

Part II: SCRA-aligned credential issuance – the Act's implementation provisions

The Act's implementation provisions deliver a state license to those eligible to have their out-of-state license recognized under the SCRA. The military-connected applicant, a service member or military spouse with a current license in good standing in another state, receives a courtesy state-issued credential within 30 days of a completed application. Where additional review is required, a temporary credential with full privileges is issued in the interim. The temporary credential carries the same scope of practice and patient or client protections as the permanent one.

A license issued under the Act is valid for the normal license cycle or the standard licensing duration typically issued by the board. It is renewable for as long as the military-connected licensee remains in the state under U.S. military orders. Service members and military spouses licensed under the Act are subject to the jurisdiction and disciplinary action of the licensing board in the state to which they have relocated, on the same terms and to the same extent as a regular state licensee.

The provisions reflected in this approach maintain the state's role in professional regulation. Licensing boards retain authority over background checks, scope of practice, disciplinary actions and professional standards. The state remains eligible to collect application fees; however, the U.S. Department of Justice recognizes fee waivers as a best practice. Military-connected applicants remain subject to applicable state requirements, while the framework promotes a more consistent pathway and timeline for license recognition and issuance.



Integrity of the Act – both halves enacted together

The OLSMSA is engineered so that information accessibility and SCRA-aligned issuance reinforce each other. Each half answers a question the other cannot answer alone.

- The issuance provisions answer the question: Did the state act fast enough for the family?
- The information accessibility provisions answer the question: Can the state demonstrate that its licensure policies are reaching military families?

Adopting the issuance provisions without the information accessibility provisions produces faster credentialing without the data needed to know whether the military-connected applicant received it. Adopting information accessibility provisions without the issuance provisions produces detailed reporting on a system the state has not improved. Either way, the Act's purpose is half-met, and the state's good work goes unmeasured by the federal entities that need the data for future basing decisions.

Only full enactment is credited as adoption of the Act.

State precedents that informed the model

The provisions in the OLSMSA reflect policy priorities identified by the department for state action. The precedents below informed the Uniform Law Commission's work and remain available for states that elect to extend beyond the Act's minimum.

Michigan – the “shall issue” framework:

The 2022 ULC study committee analyzed Michigan's military spouse licensure statute as the leading shall-issue precedent. The Michigan provision directs the licensing department, on satisfaction of the eligibility criteria, to issue a license without examination.

Other supporting precedents:

The drafting committee's record reflects review of statutes from a range of states:

- Texas – Occupations Code Chapter 55, military spouse expedited license issuance
- Virginia – Code of Virginia Title 54.1, temporary authorization to practice for military spouses
- Arizona – A.R.S. Title 32, Chapter 43, universal licensure recognition
- Pennsylvania – state-researched endorsement framework for military spouses