

June 1, 2022

The Honorable Annette Cleveland, Chair
Senate Health and Long-Term Care Committee
Post Office Box 40466
Olympia, WA 98504-0466

The Honorable Eileen Cody, Chair
House Health Care and Wellness Committee
Post Office Box 40600
Olympia, WA 98504-0600

Dear Senator Cleveland and Representative Cody:

In 2020, [Senate Bill 6551](#) created the International Medical Graduate (IMG) implementation work group. The work group was established in chapter 18.71 RCW under the authority of the Washington Medical Commission (WMC) with staff support from the Department of Health (DOH). Its purpose is to implement [report recommendations](#) from the 2019 IMG work group. This is the second of five annual reports due by June 30.

The work group is directed to:

- Propose clinical readiness criteria for IMGs using published benchmarks for medical school graduation or residency admission.
- Propose a grant award process for distributing funds for approved entities to provide career guidance and clinical training to international medical graduates.
- Propose an evaluation process to grant a hardship waiver to IMGs who cannot provide all necessary documentation for licensure due to circumstances outside their control.
- Provide policy recommendations to the legislature.
- Annually report to the legislature by June 30, 2021, and yearly thereafter until July 1, 2025.

Notable Items to Report

The work group met multiple times throughout 2020-2021 and acted on the following:

- Adopted the language in [Substitute House Bill 1129 \(SHB 1129\)](#) as the clinical experience criteria required for IMGs to gain a time-limited clinical experience license.
- Approved the WMC implementation of the clinical experience license, effective October 19, 2021.
- Considered a potential portal and assessment system for IMGs gaining clinical experience.
- Recommended the exceptional waiver pathway be limited to the truly exceptional IMGs.

Rulemaking

Senate Bill 6551 directed the WMC to establish a time-limited clinical experience license through rulemaking for IMGs gaining clinical experience.

The WMC filed a [CR-101](#) in 2020 to begin rulemaking. While the WMC was developing draft language, the 2021 legislature passed [SHB 1129](#), which established requirements for the clinical experience license ([RCW 18.71.095 \(6\)](#)). On August 18, 2021, the WMC held a rules workshop where commissioners

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voted to adopt the language in SHB 1129, rather than the similar language they had drafted. WMC initiated the CR-102 in November of 2021.

The WMC took the authorization from HB 1129 and successfully launched the MD Clinical Experience license on October 19, 2021. WMC received the first applicant that same week. WMC now has a fully [online application and practice agreement portal](#) where new applicants are encouraged to apply. The WMC has proposed interpretive statements for the clinical experience license, one of which has been adopted, and the other is under review by the secretary.

Exceptional Waiver

The WMC will address exceptional waiver recommendations with its commissioner-led licensing panel. This work is planned for completion in June 2022.

WMC staff will continue to lead the IMG implementation work group, with staff support from the Department of Health, for the remaining requirements, which include:

- Completed research for IMG career guidance.
- A grant funding process proposal for the WMC's consideration.
- A clinical readiness criteria proposal for IMGs using published benchmarks for medical school graduation or residency admission.

Policy Recommendation

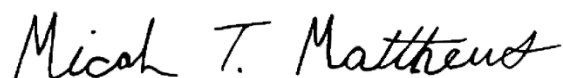
We recommend that the legislature use the Fund 319 account for this work. The use of grants and donations for funding is in the statute, but there is no specified place in the state treasury for those monies. The WMC is working with DOH to better make use of the Fund 319 account to support the IMG work group's efforts and SB 6551.

Additionally, the work group recommends the legislature fund a full-time equivalent (FTE) position at the Health Services Consultant level three or higher to prepare and manage the grant award process and the contracts with the recipient organizations.

The WMC has an [IMG Work Group Webpage](#) that includes meeting agendas/minutes, presentations, documents, and member rosters.

For questions about this report, please contact [Micah Matthews](#), deputy executive and legislative director, Washington Medical Commission.

Sincerely,



Micah Matthews, MPA, CPM
Deputy Executive and Legislative Director, Washington Medical Commission