

November 14, 2023

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

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

Dear Senator Cleveland and Representative Riccelli,

In 2020, [Senate Bill 6551 \(SB 6551\)](#) created the International Medical Graduate (IMG) Implementation Workgroup (workgroup). The workgroup was established in chapter 18.71 RCW under the authority of the Washington Medical Commission (WMC). Its purpose is to implement [report recommendations](#) from the 2019 IMG Assistance Workgroup. This is the third of five annual reports. The workgroup is directed to:

- **Propose clinical readiness criteria for IMGs using published benchmarks for medical school graduation or residency admission.**
 - **Status-Complete:** The purpose of this tool is to evaluate and track the necessary skills required for IMGs to successfully gain a residency position. This was voted on and approved in September 2022 by the work group.
- **Propose a grant award process for distributing funds for approved entities to provide career guidance and clinical training to IMGs.**
 - **Status-in process:** The workgroup has discussed funding to be provided to the Puget Sound Welcome Back Center at Highline College to enhance the career guidance services available to IMGs. A recommendation is included in this report related to transferring authority to address those needs.
- **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.**
 - **Status-Under Reconsideration:** There is currently no way for the WMC to validate education or residency in countries where they do not have a reciprocal relationship with the U.S. or circumstances provide too much risk to the individual. The workgroup received a presentation from World Education Services (WES) on strategies to obtain education validation and are currently considering ways to implement them.

- 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 2022-2023 and completed 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 (CE) license and established the [CE license](#). Rule language was adopted by the WMC and effective November 25, 2022.
- Voted to propose a CE license evaluation tool for license supervisors to best evaluate IMGs under the CE license type. Tool is under review by the WMC Policy Committee and the DOH Secretary.
- Considered a potential portal and assessment system for IMGs gaining clinical experience in partnership with the Washington Academy for IMGs, which we are currently assessing.
- Recommended the exceptional waiver pathway be limited to the truly exceptional IMGs.
- Testified in support of [Senate Bill 5394](#), which removed the requirement that a supervising physician hold medical malpractice insurance for claims against an international medical graduate practicing under their supervision. This was signed by the governor and effective March 20, 2023.
- Considered World Education Services (WES) as an alternative education evaluation to the Educational Commission for Foreign Medical Graduates (ECFMG) and other existing pathways. WES assesses the educational credentials of individuals who have been displaced because of adverse circumstances in their country and have limited proof of academic achievement. This has not been adopted and requires more analysis related to training pathway impacts and law changes.
- The WMC requested and received an FTE position to administer grant funding to qualified applicants as specified in SB 6551.

Licensing Waivers

- The workgroup is attempting to successfully find a suitable means to implement the hardship waiver that allows the WMC to use reliable documentation. Suitable substitutions such as WES Gateway are being explored as viable alternatives. Any future recommendations related to this requirement will likely require a statutory change.
- The WMC established a procedure for exceptional qualification waiver applicants. Commissioners are reevaluating the rules for potential expansion in the scope of the exceptional waiver and broadening the scope, thus granting greater access to licensure for qualified IMGs.

Policy Recommendations for 2024

The workgroup supports the following two recommendations to the legislature:

1. Clarify that certain requirements of [SB 6551](#) shall be resourced to the Highline College Welcome Back Center (Highline). Highline manages international student recruitment, admissions, and retention, and works closely with international students to address their specific educational hurdles. Therefore, Highline is more qualified and resourced to address elements of the evaluation, navigation, and testing process prior to licensing with the WMC. We recommend adding an FTE case manager to the Welcome Back Center to focus on pre-licensure IMG navigation of evaluation, testing, and system navigation.

Washington state needs four new funded positions not attached to the National Resident Match Program with specific criteria to require qualified Washington IMGs be placed in these positions to address the residency gap. This will bring more IMGs into the Washington health care systems and the benefits to Washington residents that entails.

2. Establish four new fully state-funded residency positions dedicated to IMGs as a budget proviso:
 - a. To include but not be limited to psychiatry, family medicine, and internal medicine positions;
 - b. Fund at \$180,000 annually per position for four years as an ongoing funding source;
 - c. Grant the WMC authority to evaluate program applications per the IMG Implementation Workgroup recommended grant process, as allowed by SB 6551.

The WMC appreciates its time in service as workgroup staff. As part of that work the WMC maintains an [IMG Workgroup Webpage](#) that includes meeting agendas/minutes, presentations, documents, and member rosters. For questions about this report and the recommendations within, please contact the Washington Medical Commission.

Sincerely,



Micah T. Matthews, MPA

Deputy Executive and Legislative Director
Washington Medical Commission