



June 27, 2025

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

The Honorable Dan Bronoske, Chair
House Health Care Committee
Post Office Box 40600
Olympia, WA 98504-0600

Dear Senator Cleveland and Representative Bronoske,

In 2020, [Senate Bill 6551 \(SB 6551\)](#) created the International Medical Graduate (IMG) Implementation 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 final of five required 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 workgroup.
- **Propose a grant award process for distributing funds for approved entities to provide career guidance and clinical training to IMGs.**
 - **Status-Complete:** The workgroup was presented with and approved recommending the grant process to the WMC for adoption at the May 2024 meeting.
- **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-Proposed to Washington State Legislature** The workgroup provided three policy bills for the consideration of the legislature. Considering funding restraints and policy discussions, only one of the three bills ultimately succeeded.

- **SSB 5118 (2025 Legislative Session):** Updates the Clinical Experience license administered by the WMC to provide reduced barriers and extended practice time to IMGs. Passed the Legislature and signed into law on April 24th, 2025
- **SB 5226 (2025 Legislative Session):** Proposed to create IMG dedicated residency positions outside of the Match process to better address the disparate match rates of IMGs to Washington residency training programs. The bill was heard in the Senate but did not ultimately progress.
- **SB 5185 (2025 Legislative Session):** Proposed to create a preceptorship pathway for IMGs to gain full licensure through four years of supervised clinical experience. The bill was heard in the Senate but did not ultimately progress.
- **Provide policy recommendations to the legislature.**
- **Annually report to the legislature by June 30, 2021, and yearly thereafter until July 1, 2025.**
 - **Status: Complete**

Notable Items to Report

The work group met multiple times throughout 2024-2025 and completed the following:

- The IMG Workgroup has diligently curated and voted on a comprehensive grant awarding process as mandated by SB 6551. This process aims to provide financial assistance to International Medical Graduates (IMGs) and associated organizations in need of financial support for their licensure and examination preparations. After extensive discussions and evaluations, the workgroup developed criteria and guidelines to ensure fair and effective distribution of the grants. The finalized proposal reflects a consensus within the group and aligns with the objectives outlined in SB 6551. Since its development, the grant award process curated by the IMG Workgroup was successfully approved by the commission for adoption, solidifying the next steps in supporting IMGs throughout the licensure process. However, due to lack of legislative action on the fiscal and policy front, the position associated with the grant funding process will not be filled and the grant program will not be initiated.
- For the IMG group to further develop the IMG Residency Program proposal they found that it was necessary to ask the National Residency Match Program (NRMP) for an innovative waiver to allow for new residency positions to exist outside the match. Together, and in subgroups created by the IMG workgroup, WMC requested a waiver from NRMP. The waiver request included a summary of the program and mission, an explanation of how the match programs would hinder the proposed residency

program, a student selection process, an opt-out process, and a summary of the intended goals and outcomes of the program.

The workgroup successfully developed this waiver over the course of several months. However, due to lack of legislative action on the fiscal and policy front, the attempt to secure a waiver is suspended until statutory language required by NRMP as a prerequisite to consideration of the waiver request is put in place.

- The workgroup developed and distributed a letter to the Designated Institutional Officials (DIOs) of The Accreditation Council for Graduate Medical Education (ACGME) -sponsored programs in Washington State, outlining the proposed program details to assess interest levels. The Accreditation Council for Graduate Medical Education (ACGME) is the body that accredits residency and fellowship programs in the United States to ensure quality training for physicians after medical school.

Designated Institutional Officials (DIOs) are senior leaders within ACGME-accredited sponsoring institutions who oversee all accredited programs, ensuring they meet ACGME standards, supporting program directors, and maintaining a high-quality educational environment for residents and fellows. A survey was circulated to all officials to determine how many programs would potentially participate, contingent upon receiving an NRMP waiver and state legislative funding. The results of this survey indicated that the majority of the DIOs who responded were enthusiastic and open to participating in the program with the assumption that funding would be provided.

- To facilitate further discussion, the workgroup held two Q&A sessions, providing DIOs and affiliates with an opportunity to explore details, share ideas, and address concerns about participation and the proposed program. Most institutions expressed strong interest in establishing IMG-designated residency slots. However, smaller programs raised concerns about staffing capacity to accommodate the program and potential challenges in maintaining program sustainability with an increased number of slots.

Policy Recommendations for 2026

The workgroup supported the following recommendations to the legislature in the 2025-2026 session:

1. Reconsider the bills introduced in 2025 as policy proposals to establish dedicated residency positions and alternative pathways to full licensure of IMGs.
2. Consider the alternatives proposed by the Federation of State Medical Boards and Intealth¹: [states-with-enacted-and-proposed-additional-img-licensure-pathways-key-issue-chart.pdf](#)

¹ Intealth is a private, nonprofit organization established in 2021 through the integration of the Educational Commission for Foreign Medical Graduates (ECFMG) and the Foundation for Advancement of International Medical Education and Research (FAIMER). Together, they aim to advance quality in health care education worldwide.

3. Considering the clear and present danger faced by immigrants and IMGs from current federal actors and those practitioners delivering care that could be considered politically adverse yet supported by the prevailing standard of care, reconsider the policy of absolute transparency under the Public Records Act. Specifically, the release of unredacted or identified licensee and applicant demographic and practice data to any requestor or organization without approved Data Sharing Agreements.

The Washington Medical Commission (WMC) expresses its appreciation for the opportunity to serve as staff to the IMG Workgroup. Since its establishment in 2020, the IMG Workgroup has worked tirelessly to address the barriers faced by International Medical Graduates (IMGs) in practicing in Washington State, developing innovative solutions and legislative measures to advance this cause. While we recognize that the integration of IMGs into our healthcare workforce remains an ongoing effort, the WMC is proud to have played a role in facilitating these initiatives.

We remain committed to advocating for expanded professional opportunities and work privileges for IMGs. 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 by emailing Fatima Mirza at Fatima.Mirza@wmc.wa.gov or by calling (360)-236-2750.

Sincerely,

Micah T. Matthews, MPA

Deputy Executive and Legislative Director
Washington Medical Commission