



STATE OF WASHINGTON
DEPARTMENT OF HEALTH
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June 9, 2021

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, Washington 98504-0600

Dear Senator Cleveland and Representative Cody:

In 2020, [Senate Bill 6551](#) established the second International Medical Graduate (IMG) implementation workgroup. Its purpose is to implement recommendations from the [2019 IMG workgroup](#).

Senate Bill 6551 also included rulemaking for the Washington Medical Commission (WMC) to create requirements for a time-limited clinical experience license and to develop exceptional qualification waiver requirements for applicants who “possess an acceptable body of work related to research, medical excellence, or employment, and have the recommendation of other experts in the same field or specialty.”

Over the span of five years, the workgroup 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 in an annual report to the Legislature by June 30, 2021, and yearly thereafter until July 1, 2025.

This report is the first of five annual reports due by June 30. Members were recruited in 2020 and the workgroup has met five times. During the initial year of meetings, the workgroup has:

- Begun researching and discussing draft recommendations for clinical readiness criteria¹ that incorporate core professional activities for entering a residency.² Core professional activities include skills and behaviors needed for success in residency training; activities focused on observable behaviors of increasing ability; and a guide for development of curriculum, assessment tools, faculty development, and student understanding.
- Provided input into the Washington Medical Commission’s (WMC) draft rule language for creation of a time-limited clinical experience license, and draft exceptional qualification waiver

¹ <https://wmc.wa.gov/sites/default/files/public/IMG/CPAs%20for%20entering%20residency.pdf>

² The workgroup based its initial work on policy recommendations by the Association of American Medical Colleges (AAMC).

requirements.³ The WMC has filed a CR-101 to begin rulemaking and plans to hold the first workshop in May.

- Begun reviewing other states' approaches to providing career guidance and clinical training to IMGs. Toward this effort, a presentation was made at the February 2021 meeting by the Minnesota Department of Health/University of Minnesota's IMG Residency Preparation Program. The state of Colorado has accepted an invitation to present its Internal Medicine Residency Program for IMGs at an upcoming meeting.

The workgroup has expressed a desire for additional leadership and direction as they continue their work. The department and WMC are committed to providing this leadership and supporting the workgroup in accomplishing the following in 2021:

- Develop a work plan with objectives and activities leading to completion of workgroup responsibilities.
- Complete and submit clinical readiness criteria recommendations to WMC for consideration of adoption.
- Complete research of IMG career guidance and clinical training programs and begin to develop a grant-funding award process for the Washington program.
- Begin to develop an evaluation process for granting a hardship waiver.

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

For questions about this report, please contact [Christie Spice](#), Acting Assistant Secretary, Health Systems Quality Assurance, or [Melanie DeLeon](#), Executive Director, Washington Medical Commission.

Sincerely,



Umair A. Shah, MD, MPH
Secretary of Health

cc: Honorable Members, Senate Health and Long-Term Care Committee
Honorable Members, House Health Care and Wellness Committee
Christie Spice, Acting Assistant Secretary, Health Systems Quality Assurance, Department of Health
Melanie DeLeon, Executive Director, Washington Medical Commission
Jessica Todorovich, Chief of Staff, Department of Health
Kristin Peterson, Deputy Secretary of Policy and Planning, Department of Health
Elizabeth Perez, Deputy Secretary of the Center for Public Affairs and Equity, Department of Health

³ SB 6551 amended IMG licensure requirements in [RCW 18.71.051](#), authorizing the WMC to waive certain requirements in rule and RCW 18.71.095 to authorize the WMC to create a time-limited clinical experience license, but did not directly include these as workgroup tasks.