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Limited License for International Medical Graduates

SSB 5185

NEW SECTION

WAC 246-919-371 Clinical experience graduate program pathway established.

(1) Pursuant to RCW 18.71.480, the commission establishes the clinical experience graduate program pathway for qualifying physicians who hold a clinical experience license issued under RCW 18.71.095(5). The pathway is intended for international medical graduates who are not otherwise eligible for full physician licensure under chapter 18.71 RCW because they have not completed an approved United States or Canadian postgraduate training program. These rules establish clear standards and procedures for both the license holders, the nominating and supervising physicians, the eligible program sites, and those wishing to be approved evaluators. The purpose of the pathway is to allow qualified clinical experience license holders as defined under (2) of this section to become eligible for a full, unrestricted physician license issued by the commission under

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chapter 18.71 RCW to practice primary care as defined in this rule.

(2) To enter the clinical experience graduate program pathway an applicant must:

(a) Hold a commission issued clinical experience license in good standing on or before July 1, 2026;

(b) Have completed 24 months of continuous supervised clinical practice. The required supervised clinical practice may occur before the effective date of these rules and does not need to occur at an eligible practice site as defined in WAC 246-919-372(3). Any gaps in practice of more than 30 days do not count toward the continuous supervised period. The commission may accept 24 months of prerequisite supervised practice if the practice was completed after July 1, 2022;

(c) Does not have active or significant disciplinary history as determined by the commission;

(d) Obtains satisfactory clinical assessment evaluations from the supervising physician in all categories in a clinical assessment evaluation approved by the commission for the period of supervised practice. Upon request, the clinical experience

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graduate pathway participant need only submit the final evaluation for the pre-requisite practice period to the commission;

(e) Submits an attestation from the supervising physician regarding their competence to enter the graduate program;

(f) Submits a written endorsement from the medical director of the practice site if different than the supervising physician.

(3) Should the supervising physician and/or the medical director refuse to provide attestation of competence or endorsement for the graduate pathway participant to enter the graduate program pathway, they must provide justification and documentation of the denial to the commission upon request.

(4) Upon completion of the prerequisites in (2) of this section, the graduate pathway participant is eligible to enter the 24-month clinical experience graduate program pathway. The graduate pathway participant must satisfy the requirements of WAC 246-919-372(1)(a) and (b). The total supervised practice time required to qualify for the graduate pathway and complete the pathway is 48 months or four years.

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(5) All costs associated with participation in the pilot program, including but not limited to applications, assessments, training, supervision, and evaluation, are the responsibility of the graduate pathway participant and practice site as determined by agreement between those parties.

NEW SECTION

WAC 246-919-372 Clinical experience graduate pathway - program requirements, supervision, eligible practice sites, and clinical skills assessment.

(1) A graduate pathway participant meeting the eligibility requirements of WAC 246-919-371 may enter the clinical experience graduate pathway by completing the following:

(a) Submit to the commission the documents required in WAC 246-919-371(2)(b), (d), (e), and (f);

(b) A new nominating letter from the appropriate physician leader clearly articulating the intent to have the graduate pathway participant enter the graduate pathway program and how the proposed site and supervising physician meet the requirements of WAC 246-919-372(3), (4), and (5).

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(c) An updated practice agreement proposing an eligible practice site under these rules, or a new practice agreement proposing an eligible practice site. All 24 months of supervised clinical practice under the graduate program must occur at an eligible practice site and in the same specialty. The 24 months of supervised clinical practice should occur at a single site, unless otherwise approved by the commission. An updated or new practice agreement must be submitted and approved prior to beginning the graduate pathway program.

(2) The requirements to complete the clinical experience graduate pathway program are:

(a) Successful completion of step three of the United States medical licensing exam;

(b) Submit documentation of 24 months of supervised clinical practice while holding a valid clinical experience license issued by the commission under 18.71.095(5) RCW. The commission will consider justifications for approval of gaps in practice on a case-by-case basis, but will not consider as complete any period that totals less than 24 months;

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(c) Passage of a commission-approved independent clinical competency assessment designed to evaluate readiness for independent practice in primary care. The evaluation must be completed in the final 12 months of the two-year graduate pathway program. Multiple attempts are acceptable, but four or more failed attempts will result in disqualification from the program as a clear indicator of need for additional formalized training;

(3) The supervising physician must meet the following requirements for participation in the graduate pathway:

(a) Be licensed in good standing under 18.71, 18.71B, or 18.57 RCW;

(b) Provide supervision that is consistent with the graduate pathway participant's clinical practice, education, training, experience, and primary care specialty. When appropriate, supervision may occur remotely and the supervising physician must be in the state of Washington;

(c) Assessments of the graduate pathway participant using the commission approved clinical assessment evaluation given at least three times in the first 12-month period, with at least

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one occurring in the first six months. The evaluation must be given at least twice in the second 12-month period, with a total of 5 reviews during the 2 years of the program;

(d) Quality review meetings between the two parties which must occur at least every 30 days; and

(e) Completion of the commission approved capstone assessment of the graduate pathway participant in the last quarter of their supervised practice. The final assessment must be submitted to the commission within 30 days after the completion of the 24th month of the program period.

(4) Practice sites eligible to host graduate pathway participants must be physically located in Washington state and meet one or more of the following categories:

(a) Hospitals;

(b) Federally qualified health centers;

(c) Government entities including federal agencies or associated health service providers;

(d) Private practices or physician employment groups with at least 10 full-time equivalent, board-certified physicians that deliver in person patient care; or

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(e) Mental and behavioral health facilities upon approval by the commission.

(5) Practice sites wishing to qualify as eligible, in addition to meeting the conditions of (4) of this section, must demonstrate to the satisfaction of the commission that the site:

(a) Has sufficient support readily available to the program participant;

(b) Has a quality review, improvement, and assurance program for graduate pathway participants.

(6) The commission may approve a site as eligible as part of the process detailed in WAC 246-919-372(1). The commission has the final decision-making authority to determine if a practice site meets these eligibility requirements. Appeals of the commission's decisions shall be conducted as a brief adjudicative proceeding. The commission adopts RCW 34.05.482 and WAC 246-11-425 through WAC 246-11-450 for these brief adjudicative proceedings.

NEW SECTION

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WAC 246-919-373 Requirements and standards for clinical skills assessment evaluators.

(1) The commission will approve and maintain a list of qualified clinical skills evaluators. Graduate pathway participants may arrange for a clinical skills assessment directly with an approved evaluator during the final 12 months of the graduate pathway program.

(2) The commission may approve clinical skills evaluators who meet the following criteria, including but not limited to:

(a) Have an established history and demonstrated expertise in physician assessment and evaluation;

(b) Provide through in-person or virtual means, a general clinical skills competency assessment targeting the medical practice area of primary care as defined in WAC 246-919-374(2);

(c) Bias mitigation training and procedures;

(d) Direct and full disclosure of the assessment results to the commission; or

(e) Other criteria as determined by the commission.

NEW SECTION

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WAC 246-919-374 Full and unrestricted physician license to practice primary care.

(1) Pursuant to RCW 18.71.480, the commission establishes the physician and surgeon license to practice primary care under the authority of 18.71 RCW. Eligibility for the license is defined in WAC 246-919-371 and 246-919-372. For purposes of medical practice, employment role definition, malpractice coverage, credentialing, and insurance billing for plans described in, but not limited to, Title 48 RCW, a physician licensed under this section shall be considered a full-scope physician.

(2) The scope of the license is primary care.

(a) "Primary care" means the provision of healthcare services encompassing health promotion, disease prevention, health maintenance, counseling, patient education, and the diagnosis and treatment of acute and chronic illnesses, inclusive of behavioral and mental health conditions.

(b) The specialties generally considered under this definition are family medicine, internal medicine with no sub-

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specialties, general medicine or practice, hospitalist, general pediatrics, geriatrics, psychiatry, and behavioral health.

(c) Primary care under this section may include non-surgical obstetrical and gynecological care as well as services provided in an urgent care or emergency department setting that are within the scope of primary care. Nothing in this section should be construed to limit further training and credentialing of a primary care license holder in surgical procedures considered part of the normal scope of the primary care specialties listed in this section.

(d) The commission may expand the definition to include additional specialties upon a demonstrated need for access to care in underserved or shortage areas. Those eligible sites wishing for such an expansion must submit their request and documentation to the commission.

(3) Those graduate pathway participants wishing to convert their clinical experience license into a primary care license must complete and submit the following:

(a) A completed application on forms created and approved by the commission;

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(b) Successful completion and submission of all graduate pathway participant requirements in WAC 246-919-371 and WAC 246-919-372 to include;

- (i) Documentation demonstrating completion of 24 months of continuous supervised clinical practice under the clinical experience license prior to entering the graduate pathway program;
- (ii) The final commission approved clinical assessment evaluation from the pre-requisite period from the supervising physician demonstrating satisfactory ratings or above in all categories;
- (iii) The supervising physician attestation that the applicant successfully completed the 24-month pre-graduate pathway prerequisite period;
- (iv) Written endorsement from the medical director of the practice, if different from the supervising physician, regarding the applicant's ability to enter the graduate pathway program;

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- (v) Documentation of successful completion of 24 months of supervised clinical practice during the graduate pathway period at an eligible practice site;
- (vi) Proof of completion of step three of the United States medical licensing examination;
- (vii) The commission-approved capstone clinical assessment evaluation completed by the supervising physician during the final month of the 24-month graduate pathway practice period;
- (viii) The full report and results from the clinical skills evaluator documenting successful passage of the assessment completed during the final year of the 24-month graduate pathway period;
- (ix) Submit to a background check as determined by the commission;
- (x) Any additional documentation required by the commission; and
- (xi) Applicable fees as required in WAC 246-919-990.

(c) In order to obtain the full license, a physician with a clinical experience license completing the graduate pathway

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program will pay the difference between the clinical experience license and the full license application fees as required in WAC 246-919-990. This license will expire on their second birth date after issuance and every two years thereafter.

(d) The primary care license issued under WAC 246-919-374 is subject to the requirements of WAC 246-919 generally, with the following exceptions:

- (i) WAC 246-919-395;
- (ii) WAC 246-919-396;
- (iii) WAC 246-919-397;
- (iv) WAC 246-919-422;

(e) All those licensed under WAC 246-919-374 are subject to the jurisdiction of the commission to the same extent as other members of the medical profession, in accordance with this chapter and chapter 18.130 RCW;

(f) Persons applying for licensure and renewing licenses under WAC 246-919-374 shall comply with administrative procedures, administrative requirements, and fees determined as provided in RCW 43.70.250 and 43.70.280.