



PREPROPOSAL STATEMENT OF INQUIRY

CR-101 (October 2017) (Implements RCW 34.05.310)

Do **NOT** use for expedited rule making

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STATE OF WASHINGTON
FILED

DATE: August 23, 2023

TIME: 3:34 PM

WSR 23-18-005

Agency: Department of Health - Washington Medical Commission

Subject of possible rule making: Removing postgraduate medical training barriers to licensing. WAC 246-919-330, Postgraduate medical training. The Washington Medical Commission (commission) is considering amending WAC 246-919-330(4) to remove two requirements that have become a barrier to licensure.

Statutes authorizing the agency to adopt rules on this subject:

RCW 18.71.017 and 18.130.050

Reasons why rules on this subject may be needed and what they might accomplish:

The Washington Medical Commission (commission) is considering amending WAC 246-919-330 to eliminate the outdated requirement for consecutive years of training in no more than two programs. This change would remove a barrier for qualified applicants to obtain licensure.

Due to the practitioner shortage, multiple pathways to board certification eligibility have been opened by the University of Washington (UW), the Accreditation Council for Graduate Medical Education (ACGME), and the American Board of Medical Specialties (ABMS). Multiple ABMS boards have programs that specifically target international medical graduates and place them in four-year training programs, with only years one and three ACGME accredited. The outcome of these programs would be physicians who are ineligible for licensure through the commission, despite four-years of postgraduate training through the UW. The first graduates of those programs will complete their training in June 2023.

Separately and recently, applications have come through where the physician has six-years of postgraduate training from their efforts to become dual licensed as a physician and a dentist. This clause has resulted in denial of those applications since parts of the training are accredited under ACGME and the rest under the Commission on Dental Accreditation (CODA), the dental profession equivalent of ACGME.

The commission has also filed an emergency rule on WAC 246-919-330(4) under WSR 23-15-056 on July 13, 2023 to address this issue while permanent rulemaking is in process.

Identify other federal and state agencies that regulate this subject and the process coordinating the rule with these agencies:

None

Process for developing new rule (check all that apply):

- Negotiated rule making
- Pilot rule making
- Agency study
- Other (describe) Collaborative rulemaking

Interested parties can participate in the decision to adopt the new rule and formulation of the proposed rule before publication by contacting:

(If necessary)

Name: Amelia Boyd, Program Manager

Name:

Address: P.O. Box 47866, Olympia, WA 98504

Address:

Phone:360-918-6336

Fax:

TTY: 711

Email: amelia.boyd@wmc.wa.gov

Web site: <https://wmc.wa.gov>

Other:

Phone:

Fax:

TTY:

Email:

Web site:

Other:

Additional comments: To join the interested parties email list, please visit https://public.govdelivery.com/accounts/WADOH/subscriber/new?topic_id=WADOH_153.

Date: August 21, 2023

Signature:

Name: Melanie de Leon

Signature on file

Title: Executive Director