



October 9, 2024

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,

[RCW 18.71.470](#) created the International Medical Graduate (IMG) Implementation Workgroup (workgroup) 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 fourth 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-Complete:** The IMG Workgroup diligently developed and voted on a comprehensive grant awarding process as mandated by SB 6551 that it recommended to the WMC for adoption at the July 2024 meeting. To supplement the establishment of this funding pathway, a recommendation to the legislature for grant funding is included as part of this report. This funding could be used to supplement pre-licensure career navigation at entities such as the Welcome Back Center or act as incentives to clinics or other health care entities that take on Clinical Experience license holders.

This grant process aims to provide financial assistance to IMGs and associated organizations in need of financial support for their licensure and examination preparations. After extensive discussions and evaluations, the workgroup must develop 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.

- **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-Recommendation Enclosed:** After extensive research and discussion, the workgroup agreed that hardship pathways they had previously discussed were not feasible for implementation by the WMC. However, as part of the policy development process, the workgroup has proposed alternatives to help IMGs facing hardships for potential 2025 legislation. Alternatives include alternate demonstrations of competence such as examinations or specialty assessments; an Apprenticeship Pathway to licensure that includes four years of supervised clinical practice, additional evaluations and documentation; and broadening the current standards for IMGs to gain Limited Licenses at the WMC discretion. Please see the next sections for more details.
- **Provide policy recommendations to the legislature.**
  - **Status-Recommendation Enclosed:** Workgroup recommendations are enclosed in this report for consideration by the legislature. Please see next section for more details.
- **Annually report to the legislature by June 30, 2021, and yearly thereafter until July 1, 2025.**

### **Notable Work Completed**

The work group met multiple times throughout 2023-2024 and completed the following:

- Recommended comprehensive grant award process for WMC consideration for approved entities to provide career guidance and clinical training to IMGs.
- Developed IMG-specific residency position recommendations and application of a Washington State exclusive waiver with the National Residency Match Program. This waiver would allow direct selection of qualified IMG candidates into programs without going through the Match process with a one-year internship/transition year built into the four-year program. We are requesting this waiver because requiring that programs recruit these positions via the Match runs counter to the structure of this training pathway. See recommendation #3 below for further details.
- Developed an apprenticeship pathway recommendation to full independent practice. The multi-year supervised practice experience is based around the Clinical Experience license and the program having residency-like metrics to be completed in a set amount of time. The program would culminate in a completion recommendation from the site, passage of board certification in a general practice focus area, and conversion of the license to a full physician license. See recommendation #4 below for further details.
- The WMC has secured a waiver from the Federation of State Medical Board's special

examination oversight committee to utilize the SPEX exam<sup>1</sup> for IMG applicants experiencing hardship related to providing documentation of medical education or training in another country. This waiver approval, when combined with the policy recommendations requested by the work group below, will serve as a foundation for evaluation of an applicant by the WMC for a full and unrestricted physician license.

### **Policy Recommendations for 2025**

A requirement of SB 6551 is that the IMG workgroup provide policy recommendations to legislature that pertain to increasing the IMG workforce in Washington State. Some of the proposed recommendations require new laws and funding methods. SB 6551 does not instruct the WMC to include these recommendations in budget submissions or propose them as agency-request legislation. As a result, recommendations will need legislative sponsorship for inclusion in statute and funding. However, the WMC has committed to advising potential legislative sponsors and facilitating communication between those legislators and the IMG workgroup.

The workgroup makes the following recommendations to the legislature:

1. The workgroup requests that the legislature allocate \$300,000 biennially to the [Welcome Back Center at Highline College](#) for the creation and maintenance of a case manager position dedicated to assisting IMGs by providing guidance for the United States Medical Licensing Examination (USMLE) process and obtaining clinical experience in preparation for residency applications.
2. To facilitate the development of the three pathways to independent practice for IMGs (standard residency match, IMG-specific residency, and apprenticeship), the Clinical Experience license statute must be updated. The updates include extending the time of validity from four years to eight years, defining acceptable scope, clarifying that the licensee may participate in institutional credentialing and insurance programs, aligning the test requirements with the Educational Commission for Foreign Medical Graduates (ECFMG) certification requirements, and removing the requirement that the IMG be a Washington resident for 12 months.
3. The workgroup proposes the legislature allocate funding for IMG specific residency positions in four-year programs as part of the waiver application for these positions to exist outside of the Match process directed by the National Residency Matching Program (NRMP). Notably, in order to be considered for the NRMP waiver, Washington must have authorized statute language in place. The funds should be awarded by the Washington Medical Commission through a grant process and disbursed by the Department of Health. The workgroup requests \$5,000,000 per biennium of ongoing funding for these positions, in addition to the request for statutory authorization of these positions to facilitate the waiver request.

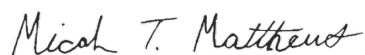
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<sup>1</sup> Examination available through the Federation of State Medical Boards. The SPEX is designed to assess the ability to apply, at a minimally acceptable level, the general medical knowledge considered essential for unsupervised physician practice. It is used to re-examine a physician's ongoing level of basic medical knowledge.

4. The workgroup proposes an apprenticeship pathway to address the challenges faced by IMGs in obtaining full licensure and to leverage their medical expertise in addressing healthcare needs. The basis of the apprenticeship program is a period of supervised practice under the Clinical Experience license leading to passage of a board certification exam before converting the license to a full physician license. The pathway aims to streamline the licensure process while ensuring IMGs receive adequate supervision and experience in the Washington health care system before practicing independently.
5. The workgroup requests the legislature allocate \$1.2 million dollars per biennium to distribute to entities dedicated to assisting IMGs with satisfying pre-licensure requirements including, but not limited to, certifications and completion of exams. Additionally, the workgroup recommends allowing this money to be granted to institutions as incentives to take on IMGs through the Clinical Experience license process. Moneys granted for the incentive process should amount to no more than \$30,000 per licensee for their first year of clinical practice.

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