



Interstate Medical Licensure Compact

May 16, 2018

Sent via e-mail: patricia.mcsorley@azmd.gov

**Patricia McSorley, Executive Director
Arizona Medical Board**

RE: Request for clarification of requirements for expedited licensure through the Compact

On March 21, 2018, the Arizona Medical Board (Arizona Board), asked the Executive Committee of the Interstate Medical Licensure Compact Commission (Interstate Commission) to provide clarification of the graduate medical education and the board certification requirements needed for a physician to achieve eligibility status for expedited licensure through the Compact.

Under Section 12c of the Compact, the Interstate Commission can issue, upon the request of a member state or member board, an advisory opinion concerning the meaning or interpretation of the Compact, its bylaws, Rules and actions. Under Section 12(k) of the Compact, the Executive Committee shall have the power to act on behalf of the Interstate Commission, with the exception of Rulemaking, during periods when the Interstate Commission is not in session.

The Arizona Board, in an e-mail from its executive director, Patricia McSorley, asked the Executive Committee if an applicant's successful completion of a fellowship and the applicant's subsequent certification in a radiology subspecialty satisfy the expedited licensure eligibility requirements expressed in Sections 2k(3) and 2k(4) of the Compact.

At a teleconference meeting of the Executive Committee on April 3, 2018, Commission Chair Bowden of Iowa appointed an ad hoc committee consisting of Commission Vice Chair Shepard of West Virginia and Commissioners Martinez of Minnesota and Simons of Wisconsin to review the issue and to prepare a response.

FACTUAL BACKGROUND:

Documents presented to the ad hoc committee provide the following facts concerning an applicant for expedited licensure:

1. Applicant successfully completed a radiology-diagnostic residency from July 1, 2001, to June 30, 2006, at McGill University, Montreal, Canada, and achieved certification in diagnostic radiology. The residency was accredited by Royal College of Physicians and Surgeons of Canada.
2. Applicant subsequently successfully completed a fellowship in radiology/abdominal imaging and intervention from July 1, 2006 to June 30, 2007, at Brigham and Women's Hospital in Boston, Massachusetts, and achieved subspecialty certification in radiology/abdominal imaging and intervention. The fellowship was accredited by the Accreditation Council for Graduate Medical Education (ACGME) and the certification is by the American Board of Radiology, which is a member of the American Board of Medical Specialties (ABMS).

RELEVANT ELIGIBILITY REQUIREMENTS

Sections of the Compact and corresponding administrative rules of the Interstate Commission describe the graduate medical education requirement for expedited licensure through the Compact:

Compact Section 2k(3) – Successfully completed graduate medical education approved by the accreditation council for graduate medical education or the American Osteopathic Association.

Compact Section 2k(4) – Holds specialty certification or a time-unlimited specialty certificate recognized by the American Board of Medical Specialties (ABMS) or the American Osteopathic Association's (AOA) Bureau of Osteopathic Specialists.

Administrative Rule 5.2u – “*Graduate medical education*” means an ACGME- or AOA-approved specialty or subspecialty program that achieves ABMS or AOA board eligibility status. ACGME- or AOA-approved means the program is accredited by the ACGME or the AOA. A one-year transitional internship or a one-year rotating internship does not qualify as graduate medical education required in Compact Section 2k(3) or this chapter.

Administrative Rule 5.4(1)c – Successfully completed graduate medical education approved by the ACGME or the AOA. “Completed” means graduated from an ACGME- or AOA-approved specialty or subspecialty program that results in ABMS or AOA board eligibility status. ACGME- or AOA-approved means the program is accredited by the ACGME or the AOA. A one-year transitional internship or a one-year rotating internship does not qualify as graduate medical education required in Compact Section 2k(3) or this chapter.

Administrative Rule 5.4(1)d – Holds specialty certification or a time-unlimited specialty certificate recognized by the ABMS or the AOA's Bureau of Osteopathic Specialists. The specialty certification or a time-unlimited specialty certificate does not have to be maintained once a physician is initially determined to be eligible for expedited licensure through the Compact.

DISCUSSION

Sections of the Compact and corresponding administrative rules of the Interstate Commission convey that graduate medical education and board certification are required for physicians who would be eligible for expedited licensure through the Compact:

- The graduate medical education must be accredited by the American Council for Graduate Medical Education or the American Osteopathic Association.
- The certification must be recognized by the American Board of Medical Specialties or the American Osteopathic Association's Bureau of Osteopathic Specialists.

The graduate medical education requirements expressed in Compact Section 2k(3) and Administrative Rule 5.4(1)c are intended to ensure that an eligible physician is adequately trained by having successfully completed graduate medical education.

FINDINGS AND RECOMMENDED ACTION

The applicant for expedited licensure considered by the Arizona Board in its capacity as the state of principal license for the applicant, has completed an ACGME-approved fellowship, which satisfies Compact Section 2k(3) and Administrative Rule 5.4(1)c. The applicant received specialty certification by the American Board of Radiology, which is a member of the ABMS.

The ad-hoc committee does not believe an advisory opinion as envisioned in Section 12c is necessary, as the applicant clearly satisfies the requirements concerning ACGME- or AOA-approved graduate medical education and specialty certification recognized by ABMS or AOA. The ad-hoc committee recommends the Interstate Commission continue its efforts to provide education for member boards, physicians and other stakeholders concerning the eligibility requirements for expedited licensure through the Compact.

The Executive Committee on May 15, 2018, accepted the ad-hoc committee's findings and recommendations.

This letter concludes the Executive Committee's review of the Arizona Board's request for clarification of the graduate medical education and the board certification requirements needed for a physician to achieve eligibility status for expedited licensure through the Compact.

Sincerely,



Mark Bowden, Chairman
Interstate Medical Licensure Compact Commission

CC: Executive Committee, Marschall Smith, Rick Masters