

Monday, April 29, 2024

Commissioner Comments to Proposed Rule Changes

I am writing to provide my comments to the proposed Rule Changes to the Interstate Medical Licensure Compact Bylaws currently under review and consideration.

Having represented Tennessee on the IMLCC since 2018, I have been honored to participate on the IMLCC Budget Committee during my tenure and have seen the IMLC grow from a startup into a robust organization.

Through the detailed and innovative work of the IMLCC, we are proud to mark the milestone together of 100,000 licenses being requested and issued as of April 2024. This would not be possible without collaboration, transparency, trust, and continuous improvement among the IMLCC.

Article III

Section 3. Duties

- “taking into account each Commissioner’s preference and the size of the respective committee.”

Comment: Committee assignments should be at the final discretion of the IMLCC Chair. This seems more appropriate for an IMLCC Policy rather than a bylaw change.

Article VII

Section 1. Executive Committee

- Regarding policymaking, the organization must be focused on continuous improvement, trust, and provided with the ability to work effectively throughout the year. With the IMLCC full Commission only meeting twice per year, it seems reasonable that the Executive Committee comprised of Officers, who are elected by the full commission, and Committee Chairpersons, who interact with fellow Commissioners through committee work, should have the ability to set policy during the interim between Commission meetings. Rulemaking should remain under the duties of the full commission.
- From time to time, sensitive matters may need to be reviewed by the Executive Committee and these may require an Executive Session. The Bylaws state in the Chair’s duties that the Chair, “shall act on the Commission’s behalf during the interims between Commission meetings.” It seems reasonable that the IMLCC Chair should act in good faith when deciding to enter Executive Session and use his/her discretion on whether it

needs to be open to all IMLCC Commissioners. I do not believe that it should be required to be open to the full commission.

- In my experience, I have been pleased with the current transparency of the organization in posting Full Commission and Committee meeting information on the IMLC website and opening these meetings to the IMLCC and to the public.

Section 2. Committees

- **“but shall not have a vote or make motions.”**

I concur with this as a general policy of the IMLCC rather than a bylaw change; and it is already outlined in IMLCC Policy #11.

- Regarding the proposed language regarding committees, the work performed during committee meetings is vital to the ongoing operation of the IMLC throughout the year in addition to the bi-annual Full Commission meetings.

The Budget Committee has worked well for the several years that I have participated, and these changes seem cumbersome and will slow down our necessary work to help the organization run smoothly. Our committee and the IMLC staff work well together and has open dialogue regarding the budget, audit, and other pertinent items.

Further, it would be ideal to have quorum for committee meetings. However, it is often difficult to meet quorum. The Commissioners who are present are usually regularly attending these meetings and are engaged in the committee’s work. Commissioners work across multiple time zones, and it is difficult to quickly reschedule a meeting that has been set for a considerable amount of time.

Thank you,

Penny Judd

Tennessee Commissioner

Interstate Medical Licensure Compact Commission