VERMONT

State of Vermont
Department of Health
Commissioner's Office
280 State Drive
Waterbury, VT 05671-8300
HealthVermont.gov

[phone] 802-863-7280

Agency of Human Services

MEMORANDUM

TO: Senate Committee on Health and Welfare

FROM: Vermont Department of Health

DATE: March 11, 2026

SUBJECT: S. 142 – An act relating to a pathway to licensure for internationally trained physicians and medical graduates

The Department of Health is supportive of creating a pathway to licensure for qualified internationally trained physicians and medical graduates in Vermont. In doing so, it is critical that such a pathway is implemented safely, efficiently, and effectively. In turn, the Department asks the Committee to give the Department of Health and the Board of Medical Practice one year to:

- Review other states' processes,
- Engage with third-party credentialing organizations,
- Report back on the status of implementation in other states, and
- Develop a proposal for licensing internationally trained physicians and medical graduates that can be implemented effectively in Vermont.

Investing this time is consistent with how other states have adopted and implemented these processes and will ultimately support a strong program that is appropriately tailored to Vermont, maintains the safety and health of Vermonters, and achieves the important goals of S. 142.

The process of reviewing physician license applications to ensure public safety is complex and nuanced, even for applicants from the United States. To ensure public safety, each applicant's experience, education, and examinations must be evaluated. When these credentials are acquired in other countries, such an evaluation is time and resource-intensive, requiring specialized expertise, review of foreign educational programs, assigned employees, and extensive resources. This is how New York currently operates its licensing program. Its process includes multiple reviews by the NYS Board for Medicine, the Board for Medicine Workgroup, and the

NYSED Committee on Professions, which requires significant investment of resources and expertise in evaluating international post-graduate training programs to implement.[1] The Vermont Board of Medical Practice does not have these resources or employees, or the expertise.

Other states that have developed their own licensing processes, as New York has done, have invested years in developing and implementing programs that balanced the benefit to the public and patient safety while maintaining support from the public and medical community. Many of these states still have not fully operationalized their programs and it is still too early for many of these programs to assess the impact and outcomes of these efforts.

For example, in Illinois, after passing legislation in 2023[2] giving authority to the Illinois Department of Financial and Professional Regulation (IDFPR) to establish a pathway for licensing internationally-trained physicians, the IDFPR engaged in rulemaking over a two-year period to implement the pathway before beginning to accept applicants in September 2025.[3] IDFPR also added a full-time employee as a licensing liaison to assist international licensure applications and convened a Task Force on Internationally Licensed Health Care Professionals to support this program.

Similarly in Wisconsin, after passing legislation in 2023,[4] the Department of Safety and Professional Services (DSPS) and the Wisconsin Medical Examining Board (MEB) spent months developing rules to implement the new pathways before beginning to accept applicants in October 2025.[5]

As states have moved forward on these pathways, expert organizations are also beginning to provide recommendations and guidance to support implementation. The Advisory Commission on Additional Licensing Models (ACALM), co-chaired by the Federation of State Medical Boards (FSMB), the Accreditation Council for Graduate Medical Education (ACGME), and Intealth have provided recommendations to inform the development and/or

[1] Physician Licensure and IMGS in New York State - https://www.op.nysed.gov/sites/op/files/2024-11/Physician%20Licensure%20and%20IMGs%20in%20New%20York%20State%20formatted.pdf.
[2] Illinois Public Act 103-0102 - https://ilga.gov/documents/legislation/publicacts/103/PDF/103-0102.pdf.
[3] IDFPR Announces New Pathway for Licensure for Internationally Trained Physicians to Work in Illinois - https://idfpr.illinois.gov/content/dam/soi/en/web/idfpr/news/2025/2025-09-12-img-pathway-press-release.pdf.
[4] 2023 Wisconsin Act 214 - https://docs.legis.wisconsin.gov/2023/related/acts/214.
[5] Wisconsin Offering Unique Option to Bolster Healthcare Workforce - https://dsps.wi.gov/Documents/NewsMedia/20251010ProvisionalPhysicianLicenseNewsRelease.pdf

implementation of laws permitting the licensing of internationally trained physicians,[6] recommendations related specifically to the assessment and supervision of internationally trained physicians during provisional licensure,[7] and a toolkit that provides information and guidance to help implement assessment and supervision recommendations.[8]

Vermont can benefit from the experience, knowledge, and actions of other states and experts that are paving the way in developing processes and infrastructure for implementing these pathways. We can only do so if we take additional time to learn about how they have put these pathways into practice, what resources are needed to do so, whether sharing certain resources or infrastructure might be possible, and how to tailor these experiences to Vermont. This will also provide time to evaluate and learn from the outcomes in other states that have just begun to implement systems, and for third-party organizations to expand and develop.

Rather than reinvent this wheel on our own, the Department of Health and the Board of Medical Practice ask for the opportunity to leverage and learn from other states' experience. To do this, we need additional time.

The Department understands the need to monitor progress on this important endeavor. We are happy to provide, in one year, an update on the status of implementation in other states and to develop a proposal for licensing internationally trained physicians and medical graduates that can be implemented effectively in Vermont. Investing this additional time will ultimately support a sustainable program that balances program efficiency, equitable access and the safety of Vermonters. Thank you for your consideration and your work to date on this important topic.

[6] Advisory Commission on Additional Licensing Models Guidance Document, February 2025 - https://www.fsmb.org/siteassets/communications/acalm-guidance.pdf.
[7] Advisory Commission on Additional Licensing Models Guidance Document, August 2025 - https://www.fsmb.org/siteassets/communications/acalm-guidance-2.pdf.
[8] Assessment of Internationally Trained Physicians During the Supervisory Period: A Toolkit for Institutions and Supervisors - https://www.intealth.org/initiatives/ITPAssessmentToolkit.pdf.