September 16, 2022

Marschall Smith  
Executive Director  
IMLC Commission  
5401 South Prince Street  
Office 111  
Littleton, CO 80120

RE: Proposed Amendments to IMLC Rule Chapter 6

Dear Mr. Smith,

Thank you for the opportunity to comment on the proposed amendments to IMLC Rule Chapter 6. The Alabama State Board of Medical Examiners (“ALBME”) and Medical Licensure Commission of Alabama are committed to the success of the IMLC and appreciate the IMLC’s commitment to providing an avenue for expedited medical licensure while respecting the authority of member states to regulate medicine within their respective borders. We understand that most of the amendments are designed to afford member states more discretion in how they handle disciplinary violations committed by licensees. The ALBME and MLC support these changes and endorse member-state discretion as a guiding principle that should inform IMLC rulemaking.

While we support the changes to Rule 6.5 and the proposed addition of Rule 6.6, the language in the proposed addition of Rule 6.7, under the heading “Restrictions on Disciplinary Action Enforcement,” is overbroad and ambiguous and could be exploited by unsafe physicians in ways that the drafters of the rule have not intended. We appreciate the intention of the rule; however, we recommend that proposed Rule 6.7 either be stricken entirely or substantially revised to narrowly tailor its scope and prevent unwanted abuses.

Sincerely,

Aaron Dettling  
Counsel  
Medical Licensure Commission of Alabama

E. Wilson Hunter  
General Counsel  
Alabama State Board of Medical Examiners