



ALABAMA STATE BOARD OF MEDICAL EXAMINERS

OFFICE OF THE GENERAL COUNSEL
E. Wilson Hunter, General Counsel

Post Office Box 946
Montgomery, Alabama 36101-0946
848 Washington Avenue
Montgomery, Alabama 36104

Phone (334) 833-0188
Email whunter@albme.org

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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