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5510 Research Park Drive  
P.O. Box 259038  
Madison, WI 53725-9038  
608.274.1820 | FAX 608.274.8554 | [www.wha.org](http://www.wha.org)

June 27, 2019

Kenneth Simons, MD  
Chair, Medical Examining Board of Wisconsin  
Timothy Westlake, MD  
Vice Chair, Medical Examining Board of Wisconsin  
Department of Safety and Professional Services  
PO Box 8366  
Madison, WI 53708-8366

Re: WHA Proposal for MEB to Add Physician Licensure Processing Time Measures as a Standing Agenda Item

Dear Dr. Simons and Dr. Westlake,

In follow up to WHA's proposal during the June 19 Medical Examining Board (MEB) meeting for the Board to consider adding physician licensure application processing time metrics as a standing report item on the Board's agenda, we are sending this letter to offer some additional specificity and background regarding this proposal.

Based on the lively conversation of the Board following our proposal, this appears to be an area of shared interest for the Board, WHA and our mutual physician stakeholders. We appreciate and thank the Board for adding this topic and proposal to the agenda for the Board's July 17 meeting.

### **Background, Intent, and Goals**

In late 2018, WHA finalized a WHA Physician Regulatory Burden Work Plan that reflected input from the WHA Board, the WHA Physician Leaders Council, and other hospital, health system, and physician leaders throughout Wisconsin on their top regulatory burdens impacting physicians. One of the top state regulatory issues identified by physicians and administrators alike was timeliness of physician licensure processing. An outcome of that Work Plan was to work with the MEB and Department of Safety and Professional Services (DSPS) to begin transparently reporting physician licensing processing time measures.

Over the years, WHA has worked with DSPS to ensure physician licensing processing is timely, and those discussions have continued with Secretary Crim and Assistant Deputy Secretary Hereth. While licensure delays are frustrating, WHA also understands that oftentimes licensing delays are caused by delays in receiving supporting information from other state boards, third parties, and applicants. It is also not clear whether lengthy delays are systemic or confined to a relatively few number of cases.

Given those discussions and concerns recently expressed, we believe that a good next step would be for DSPS to begin formally measuring and regularly reporting to the MEB public measures of licensure processing timeliness. Transparently measuring the timeliness of each part of the licensure process could achieve multiple goals:

- 1) Provide the MEB with additional information to help monitor and ensure physician licenses are being processed in a timely way, and identify where problems in the process may exist and where they do not.

- 2) Provide physicians, hospitals, health systems, and the public with a better understanding of the different parts and responsibilities of the licensure process and give them a baseline expectation regarding how long it generally takes for a license to be processed.
- 3) Help identify for all whether very long licensure delays are a norm or a relatively unusual circumstance.

WHA also recognizes measurement burden and the time that it takes staff to gather data and calculate metrics. Currently, DSPS publicly sets an aggregate goal and measures “credentialing time frame for processing” for all DSPS licenses and credentials.<sup>1</sup> Our proposal would expand that measure for physician licensure but seek to limit the additional granularity to actionable and important distinctions.

### **Proposed Measures and Reporting**

Subject to additional refinement by DSPS staff and the MEB, WHA proposes that the MEB formally request that DSPS staff report each quarter to the Board data regarding licensure processing timeliness. Potential metrics could include:

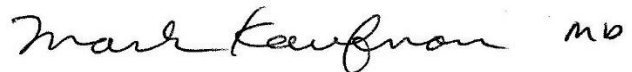
- 1) The number of Compact, non-Compact, and FCVS-supported physician licenses applied for and/or granted/denied.
- 2) The average and 85<sup>th</sup> percentile length of time from DSPS receipt of a license application to ultimate disposition for Compact, non-Compact, and FCVS-supported physician licenses.
- 3) The average and 85<sup>th</sup> percentile length of time that a licensure application in possession of DSPS **is awaiting an action by DSPS** before the license can proceed to the next step in the process.
- 4) The average and 85<sup>th</sup> percentile length of time that a licensure application in possession of DSPS **is awaiting an action by an applicant or third party** before the license can proceed to the next step in the process.
- 5) Number of contacts (phone or email) with questions or inquiries about a physician license application status.
- 6) A non-identifiable summary of top issues resulting in licensure processing delays (e.g., missing form, delay in receiving medical education verification form from applicants’ medical school).

WHA appreciates the partnership it has had with the MEB in recent years on important policy issues including enacting and maintaining the Interstate Medical Licensure Compact and addressing opioid abuse in Wisconsin. We look forward to continuing this partnership as we further explore physician licensure delays together.

Sincerely,



Ann Zenk  
WHA Vice President Workforce and Clinical Practice



Mark Kaufman, MD  
WHA Chief Medical Officer

CC Dan Hereth, Assistant Deputy Secretary  
Yolanda Y. McGowan, Division Administrator

<sup>1</sup> See page 9-12 of the September 17, 2018 DSPS Agency Budget Request. <https://doa.wi.gov/budget/SBO/2019-21%20165%20DSPS%20Budget%20Request.pdf>. The current and ongoing goal for that measure is 7-10 business days.