

August 26, 2025

Jacintha Duthu
Executive Staff Officer
Louisiana State Board of Medical Examiners
630 Camp Street
New Orleans, LA 70130
Email: jduthu@lsbme.la.gov

Via USPS and Email

Re: Public Comments – Department of Health – Board of Medical Examiners – Fully Trained Foreign Physicians (LAC 46:VLV.321, 323, and 329)

Dear Ms. Duthu:

On behalf of the membership of the Louisiana Hospital Association, we appreciate the opportunity to provide public comments regarding the Notice of Intent (NOI) captioned as “Department of Health – Board of Medical Examiners – Fully Trained Foreign Physicians (LAC 46:VLV.321, 323, and 329),” which was published in the July 2025 edition of the *Louisiana Register*.

Louisiana continues to face challenges in the recruitment and retention of physicians. Act 646 of the 2024 Regular Legislative Session sought to open an additional pathway to address the physician shortage by creating an opportunity for physicians educated and trained in countries outside of the United States and Canada to be licensed in Louisiana. We are concerned that several of the criteria included by the board in the proposed rule would significantly curtail the ability of fully trained foreign physicians from being able to utilize this licensure pathway and may be in contravention to the enacting legislation.

We are particularly concerned with the proposed requirements that the physician complete steps 1-3 of the USMLE and that the offer of employment must be from a hospital in a “rural or medically underserved area or in a hospital to fill a chronically understaffed position.” The enacting legislation simply requires the foreign trained physician to “complete a residency or substantially similar post-graduate medical training” or “practiced as a medical professional in the individuals licensing country for no less than five years.” In addition, the enacting legislation does not limit the geographic area that a hospital must be located within or for a position that is “chronically understaffed” in order for the offer of employment requirement to be satisfied. We encourage the board to revise the NOI to more closely align with the criteria and requirements set forth in Act 646 of the 2024 Regular Legislative Session.

We would further encourage the board to issue full and unrestricted licenses pursuant to this licensure pathway. While the rule does not specifically delineate the type of licensed that will be issued under the proposed rule, we would encourage the board to ensure that any physician qualifying for licensure under this proposed rule be given a full and unrestricted license due to the significant challenges posed by numerous payors and medical malpractice insurers that do not recognize temporary or restricted licenses.

We appreciate the consideration of the board and continue to look forward to working collaboratively with the board to identify ways to address the growing physician shortage in Louisiana while still ensuring the highest quality of care for the residents of Louisiana.

Respectfully,

A handwritten signature in blue ink that reads "Paul A. Salles". The signature is fluid and cursive, with a long horizontal stroke at the end.

Paul A. Salles
President & CEO