



March 31, 2020

By email ([patricia.mcsorley@azmd.gov](mailto:patricia.mcsorley@azmd.gov)) and regular mail

Patricia McSorley  
Executive Director  
Arizona Medical Board  
1740 East Adams Street, Suite 4000  
Phoenix, Arizona 85007

Dear Ms. McSorley:

I write on behalf of the Arizona Hospital and Healthcare Association to follow up on Arizona Department of Health Services (ADHS) Administrative Order 2020-01, in which ADHS instructed health care professional boards to identify licensure requirements for which a waiver is necessary to adequately address the State of Emergency. I am aware based on the Arizona Medical Board (AMB) website notice that this week the AMB met to develop a process for temporary waivers. AzHHA has convened (virtually) a task force representing member and non-member hospitals from throughout the state to assist hospitals in addressing regulatory impediments to hospital patient care during the anticipated surge in patients.

Very high on the list of hospital concerns is the potential for licensing obstacles when hospitals enlist out-of-state and retired physicians to augment the physician workforce caring for hospitalized patients during the crisis. Out of state physicians may not have current Arizona licenses, and retired physicians may no longer hold any state license. Nevertheless, such physicians may have valuable skills and abilities that could save lives during the surge.

Therefore, I urge the AMB to adopt a very truncated emergency application, with assurance of quick action, to provide for temporary licensure of physicians seeking to provide Covid-19 services in Arizona. This minimal licensure application would allow both physicians licensed in other states and retired physicians to provide services during the emergency. Both the Arizona Board of Osteopathic Examiners and the Arizona State Board of Nursing have adopted similar approaches.

Even beyond the notion of a truncated emergency application, AMB could interpret A.R.S. § 32-1421(A)(1) to exempt from licensure requirements physicians providing medical assistance in hospitals during the Covid-19 emergency.

I also urge the AMB to grant wide-ranging waivers, not just to individual physicians but to categories of physicians, with the goal of getting physicians into hospitals quickly, specifically to provide care during the emergency. For example:

- The Universal Recognition license requires a physician to prove residency in Arizona or provide a military verification form. But physicians may come in from out-of-state to assist in care in Arizona, so the residency requirement should be waived for the duration of the emergency.
- A reactivation application is only available to physicians with inactive licenses. But retired physicians may not have maintained active licensure. This category should be broadened, at the very least, to allow Arizona physicians who have retired in the past five years with unimpaired licenses to reactivate their licenses for the duration of the emergency.
- A pro bono license should be available under the same conditions as a Universal Recognition license and a reactivated license for the duration of the emergency.
- The use of temporary licenses could also be expanded to make it easier for physicians to start practice in hospitals with urgent needs.

AzHHA also requests that the AMB provide assurances of non-enforcement against:

- Physicians whose licenses that expire during the emergency, so long as they complete their licensure applications within a reasonable period after the emergency is over.
- Physicians who do not obtain the total amount of required continuing medical education for licensure when they do apply for re-licensure after the emergency is over, so long as they catch up on CME by a reasonable time after the emergency is over.
- Physicians who provide care to patients by telemedicine that does not strictly comply with Arizona telemedicine requirements. For example, physicians may provide care using video platforms such as Zoom or Microsoft, or without having performed a physical examination prior to providing telemedicine services.

Thank you for your consideration of these requests, which are critically important for hospitals and patients in Arizona during this challenging time. Please do not hesitate to call me with your questions or to discuss these requests further.

Sincerely,



Ann-Marie Alameddin  
President and Chief Executive Officer  
Arizona Hospital and Healthcare Association

cc: All Arizona hospitals