



SB 798 Postgraduate Training License Changes Effective January 1, 2020 Frequently Asked Questions (FAQs)

POSTGRADUATE TRAINING LICENSE (Business and Professions Code Section 2064.5)

Q: Who is required to obtain a Postgraduate Training License?

A: Any Osteopathic Medical School graduate who is accepted into an American Osteopathic Association (AOA) accredited or Accreditation Council for Graduate Medical Education (ACGME) accredited postgraduate training program in California and has not already completed 36 months of their residency by January 1, 2020 and does not already have full licensure.

Scenarios of who is required to obtain a Postgraduate Training License

Scenario #1: Second year residents who enrolled in a residency program July 2018.

A: If these second year residents apply for a license **prior** to December 31, 2019, they will be eligible to be issued a full license and not otherwise be subject to the new law.

A: If these second year residents apply for license **after** January 1, 2020, these residents will be subject to the new law and be required to apply for a Postgraduate Training License and be required to complete 3 years of residency to be eligible for full licensure.

Scenario #2: First year residents who enroll in their residency program July 2019.

A: These residents will be required to apply for a Postgraduate Training License between January 1, 2020 and June 30, 2020.

Scenario #3: Residents who first enroll in residency program after January 1, 2020.

A: Those residents will be subject to the new law.

Q: When should an applicant apply for their Postgraduate Training License?

A: Applicants may apply for their Postgraduate Training License as soon as they have graduated from medical school, completed COMLEX Level 1 and 2 and received confirmation of acceptance into an AOA or ACGME accredited California program.

Q: What documents are required to apply for a Postgraduate Training License?

A: The same documents as required for full licensure with the exception of the COMLEX Level 3 scores and documentation of completion of 36 months residency program. Documents required include completed application; copy of diploma, COMLEX Level 1 and 2CE and PE; certified transcripts, finger print clearance; form completed and submitted by residency program confirming acceptance in residency program, non-refundable application and processing fee.

Q: Will I have to re-submit the same documents when I apply for a full license?

A: No. The Board will create a special application for applicants holding a Postgraduate Training License that will only require submission of your COMLEX Level 3 scores and documentation of completion of 36 months of residency. The Board is creating a streamline process for applying for licensure once applicants have completed their 36 months residency.

Q: What if my residency program is for more than 36 months?

A: Once you have completed the 36 months in the residency program, you have 90 days to apply and obtain a full license to continue in your residency program.

Q: When will a trainee be required to have the Postgraduate Training License issued?

A: The trainee must obtain a Postgraduate Training License within 180 days after enrollment in an AOA or ACGME accredited postgraduate training program.

Q: How much will the Postgraduate Training License cost?

A: The Board is currently determining the cost.

Q: How long is a Postgraduate Training License valid?

A: The Postgraduate Training License is valid for a total of 39 months. This allows an applicant the opportunity to complete the required 36 months of postgraduate training with a 90 day grace period to obtain a full and unrestricted license.

Q: Is the Postgraduate Training License renewable?

A: No. It is only valid for up to 39 months.

Q: Are there circumstances that can change how long a Postgraduate Training License is valid?

A: Generally, the Postgraduate Training License is valid for a total of 39 months. However, there are circumstances that can change this timeframe of the license. For example, if an applicant completes an AOA or ACGME accredited internship or transitional year out of state and applies for a postgraduate training license, the validity of the training license will be adjusted based on the amount of credit granted. It may also be adjusted for program status changes, such as a leave of absence.

Q: What happens if residents transfer from one residency program to another?

A: After January 1, 2020 residents may transfer to another residency program, but are required to complete 24 months of the required 36 months of training at the same residency program.

Q: Will an applicant be issued any proof that they possess a Postgraduate Training License and will it be made public?

A: Yes, a postgraduate training licensee will be issued a pocket card which will identify that the intern/resident holds an approved Postgraduate Training License and the information will be displayed on the Board's website under the license look-up tab.

Q: Is a resident issued a Postgraduate Training License subject to discipline by the Osteopathic Medical Board?

A: Yes. Under the new law, the Board has authority to discipline residents holding a Postgraduate Training License.

Q: Can the Board deny residents a Postgraduate Training License?

A: Yes. The Board may deny applicants a Postgraduate Training License if they fail to meet all of the requirements, are guilty of unprofessional conduct or any cause that would otherwise subject a licensee to revocation or suspension of his or her license.

Q: Can a Postgraduate Training License be issued a probationary license or be disciplined?

A: Yes, a trainee can be issued a probationary Postgraduate Training License. A Postgraduate Training License is subject to the same disciplinary process as a full and unrestricted license.

TRANSITION FROM POSTGRADUATE TRAINING LICENSE TO FULL AND UNRESTRICTED LICENSURE

Q: What is the next step once a Postgraduate Training Licensee meets the 36 month postgraduate training requirement?

A: The applicant, who is a holder of a Postgraduate Training License, applying for a full license is only eligible if they complete a minimum of 36 months residency. Upon completion of 36 months of residency, the applicant will need to submit a *Postgraduate Training License to Physician's and Surgeon's Certificate Application* with the required licensing fees, an updated NBOME Transcript of Scores confirming a passing score on COMLEX level 3, and a Certificate of Completion of AOA or ACGME Postgraduate Training form from the program.

POSTGRADUATE TRAINING REQUIRED FOR A FULL AND UNRESTRICTED LICENSE

Q: How many years of postgraduate training are needed to qualify for licensure in California?

A: To qualify for licensure in California, an applicant must have completed 36 months of AOA or ACGME accredited training. It is required that a trainee complete at least 24 consecutive months in the same training program.

However, if an applicant has satisfactorily completed at least one year of approved postgraduate training, is certified by a specialty board authorized by the AOA or approved by the American Board of Medical Specialties and has held an unlimited license as a physician and surgeon in another state(s) for a period of four years or more, not including any time spent in approved postgraduate training, he or she may be eligible for licensure.

Q: What happens if an applicant is already enrolled in an AOA or ACGME accredited training program in California when the law changes on January 1, 2020?

A: If an applicant has not met the current postgraduate training requirements and obtained licensure by December 31, 2019, the applicant will be subject to the change in statute requiring 36 months of AOA/ACGME accredited training. In addition, at least 24 consecutive months in the same program are required for licensure.

PROGRAM DIRECTORS INFORMATION

Q: When is a trainee required to obtain a Postgraduate Training License?

A: A trainee must obtain a Postgraduate Training License within 180 days after enrollment in a Board-approved postgraduate training program.

Q: When is a trainee required to obtain a full and unrestricted Physician's and Surgeon's certificate?

A: A trainee must obtain a full and unrestricted Physician's and Surgeon's certificate within 90 days of completion of 36 months of postgraduate training.

Q: Is the program required to inform the Osteopathic Medical Board of California of any status change for applicants enrolled in their programs?

A: Yes, programs will be required to provide the Board with a *Program Status Update/Change* form within 30 days of such actions (i.e. leave of absence, probation, break in training, any rotations for which no credit was awarded, resignation or termination.) This notice will allow the Board the opportunity to adjust the expiration date of an individual training license accordingly.

Q: Can a trainee with a valid Postgraduate Training License moonlight?

A: The holder of a Postgraduate Training License may engage in the practice of medicine only in connection with his or her duties as an intern or resident in a Board-approved postgraduate program, including its affiliated sites, or under those conditions as approved in writing and maintained in the file, by the director of his or her program. Accordingly, a holder of a Postgraduate Training License may moonlight with written authorization from the program director.