



## **SB 806 Postgraduate Training License Changes Effective January 1, 2022 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 12 months of their residency by January 1, 2022 and does not already have full licensure.

- First year residents who just completed Medical School.
- First year residents who enroll in their residency program June/July 2022.
  - These residents will be required to apply for a Postgraduate Training License between January 1, 2022 and June 30, 2022.
- Residents who first enroll in residency program after January 1, 2022.
  - 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 2PE and 3 scores. Documents required include:

- completed application
- copy of diploma
- COMLEX Level 1 and 2CE
- Certified college transcripts
- fingerprint clearance
- form completed and submitted by residency program confirming acceptance in residency program
- non-refundable application 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 12 months of residency. The Board is creating a streamlined process for applying for licensure once applicants have completed their 12 months residency.

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

**A:** Once you have completed the 12 months in the residency program you are eligible to apply for the full license. 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 fee for a PTL License is \$491.00, which is nonrefundable.

**Q: How long is a Postgraduate Training License valid?**

**A:** The Postgraduate Training License is valid for a total of 15 months. This allows an applicant the opportunity to complete the required 12 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 15 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 15 months. It can 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, 2022 residents will have to continue training at same facility. After 12 months of training they are required to obtain a full unrestricted license.

**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. The information will also 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: If I obtained my PTL license prior to January 1<sup>st</sup>, 2022 do I need to apply for a full license immediately?**

**A:** Holders of a current PTL license that was issued prior to January 1<sup>st</sup>, 2022 do not need to immediately apply for the full osteopathic license. Your license will expire on the date printed on your pocket card. Once your license expires you will have 90 days to apply for the full license.

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

**A:** To qualify for a full osteopathic license in California, an applicant must have completed 12 months of AOA or ACGME accredited training. It is required that a trainee complete at least 12 consecutive months in the same training program.

**Q: What is the next step once a Postgraduate Training Licensee meets the 12 month postgraduate training requirement?**

**A:** Upon completion of 12 months of residency, the applicant will need to submit a Physician's and Surgeon's Certificate application (OMB.1) with the required application fee, an updated NBOME Transcript of Scores confirming a passing score on COMLEX level 2 PE & level 3, and a Certificate of Completion of AOA or ACGME Postgraduate Training form (OMB.25) from the program.

**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, 2022?**

**A:** If an applicant currently has a California PTL License they are able to continue working with that license until it expires. They may apply for a full unrestricted license if they have completed 12 or more months of training at the same facility.

### **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 12 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.