



## **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: First year residents who enroll in their residency program after January 1, 2020.**

**A:** These residents will be subject to the new law and be required to apply for a Postgraduate Training License within 180 days of beginning their residency program.

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

**A:** These residents will be subject to the new law on January 1, 2020 and be required to obtain a Postgraduate Training License between January 1, 2020 through June 30, 2020.

##### **Scenario #3: Second year residents enrolled in a California residency program in July 2019.**

**A:** If second year residents apply and are licensed **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 second year residents apply for licensure prior to December 31<sup>st</sup> but do not receive their license by December 31, 2019, they will be subject to the new law and they will be required to apply for the Postgraduate Training license. Processing of licensure for licensure can take up to 4-6 months, so residents are advised to apply at least 4 months in advance.

**A:** If second year residents apply for licensure **after** January 1, 2020, these residents will be subject to the new law and be required to apply for a Postgraduate Training License within 180 days and be required to complete 3 years of residency to be eligible for full licensure in California.

##### **Scenario #4: Residents who have completed 1-2 years of residency out of state, who are enrolled in a California postgraduate residency program after January 1, 2020?**

**A:** These residents will be subject to the new law and be required to obtain a Postgraduate Training License from the Board within 180 days of beginning the California residency in order to practice medicine in their residency program. The duration of the license will depend on the length of their residency program.

**A:** If they are doing a rotation that lasts several months and ends and they go out of state for another rotation, then the license will end when their residency ends.

**A:** If they have already completed one year of residency and they intend to complete the remaining two years of residency in California, then their license will last 24 months plus a 90 day grace period.

**A:** If they have completed two years and are enrolled in a 1 year residency program in California for their third year, their license will last 12 months plus 90 days grace period.

**A:** If they do not intend to practice in California, residents seeking to attend a residency program in California will only be required to have a Postgraduate Training License for the duration in which they are practicing medicine within the California residency, which could be less than the required 36 months.

**Scenario #5: Are specialty residents that are required to complete more than 36 months of residency training required to obtain a Postgraduate Training License?**

**A:** Yes, they are required to complete a minimum of 36 months of residency before they become eligible to apply for full licensure in order to continue their residency training in California. Example: A specialty that requires 4 or more years of residency training would be required to obtain a Postgraduate Training License for the duration until they have completed 36 months of residency training, after which they will be required to obtain full licensure within 90 days after the completion of 36 months of residency. The full licensure is required to continue practicing medicine beyond 36 months within a California residency training program. They must still meet all of the licensure requirements such as passage of COMLEX levels 2 P.E. and 3 and a certificate of completion for the 36 months of residency completed.

**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. The licensure process can take up to 6 months to complete. Applicants should not apply for a PTL prior to graduating from osteopathic medical school, only postgraduation applications will be accepted.

**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 2 CE 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 is creating a streamline process for applying for licensure once applicants have completed their 36 months residency holding a Postgraduate Training License.

There will be 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 as required documentation. Those applying for full licensure having been issued a Postgraduate Training License, will not be charged an application when they apply for full licensure, but they will be charged a prorated license fee for issuance of the full license.

**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 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. PTL applicants who fail to obtain a PTL license within 180 days will have to cease all practice within their residency until such time as they are issued a PTL license. It is the responsibility of applicants to submit their applications in a timely manner.

**Q: Are residents doing a short rotation in California required to obtain a Postgraduate Training License?**

**A:** Yes, even for rotations as short as 3-6 weeks, residents must obtain a Postgraduate Training License to participate in the rotation. There is no guest license.

**Q: How much will the Postgraduate Training License cost?**

**A:** The total non-refundable application and processing fee is \$540, which includes \$491 non-refundable application and processing fee and a non-refundable \$49 for mandatory finger print clearance fee. The fee is the same regardless of the length of the residency program.

**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 an additional 90 day grace period to obtain a full and unrestricted license. The license can be for less time depending on the length of the residency program or rotation.

**Q: Is the Postgraduate Training License renewable?**

**A:** No. It is only valid for up to 39 months, which includes the grace period.

**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 the length 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 length of the training license will be adjusted based on the amount of credit granted and the length of the residency in California. 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 they are subject to the new licensure requirements that require residents to obtain a Postgraduate Training License. Residents that transfer from other programs must consider the new law that requires

residents to complete 24 months of the required 36 months of training at the same residency program. This would only apply if residents intend to apply for California licensure upon completion of their 36 months of residency.

**Q: What happens if a resident has transferred to multiple programs and has not completed 24 months at the same residency program?**

**A:** If residents transfer more than once during their 36 months of residency training, they will not be eligible for California licensure if they do not meet the requirement of completing 24 of the 36 months of residency training in the same training program. Their only option is to become licensed in another state and later apply for licensure in California as a reciprocity applicant.

**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. Additionally, the Postgraduate Training License will be searchable under the license search tab 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 license while on probation or be disciplined?**

**A:** Yes, a trainee can be issued a Postgraduate Training License that is subject to the terms and conditions of probation. A Postgraduate Training License is subject to the same disciplinary process as a full and unrestricted license.

## **TIPS FOR APPLYING FOR LICENSURE**

**First tip is to download and read the application instructions from the Board's website before applying.**

**Q: How do I apply?**

**A:** There two ways to apply: manually and online.

**Manually.** Applicants must download all of the PTL forms, complete them and submit them by mail with a check or money order.

**Online.** Go to the Board's website and click on the "Breeze" button to be redirected to the online application. Applicants choosing to submit their application online are required to create a "Breeze" account and input application details online and pay online with a credit card. The only online form is the application form OMB.22. The rest of the required forms must be downloaded from the Board's website and mailed to the Board. Since the application form OMB.22 requires the applicant sign the application, attesting to the truth and accuracy of the information provided

under penalty of perjury, a notary form is downloadable and must be signed by the applicant in the presence of a notary and mailed to the Board along with the online summary. The application is not completed without the Board receiving this notary form by mail.

Online applicants are still required to download the other required forms which are only available from the Board's website. The program enrollment form OMB.23 is downloadable and must be completed and notarized by the residency training program, not the applicant, and mailed directly to the Board.

The email you provide to the Board must be spam proof. This can be achieved by adding the Osteopathic Medical Board to your contacts so our emails will be recognized by your email provider.

**Q: What happens if my required documents are sent to the Medical Boards of California instead of the Osteopathic Medical Board of California?**

**A:** All required documents must be addressed to the Osteopathic Medical Board of California and be sent directly to the Osteopathic Medical Board of California. Any documents sent to other than the Board will not be accepted. Please make sure when you make the request for exam scores, transcripts, license verifications that you provide them with the correct address: Osteopathic Medical Board of California, 1300 National Drive Suite 150, Sacramento, CA 95834.

**Q: Can I submit digital photos?**

**A:** No. Only passport quality photographs are accepted. Not providing the correct photos will delay the processing of your application.

**Q: Can I submit a digital signature to sign my application that is notarized?**

**A:** No. Your signature must be an original wet signature only. No other format is accepted.

**Q: Do I have to have a notary present when I sign my application?**

**A:** Yes. A notary must be present when you sign your application. If you applied online, you must bring the online summary with you to the notary to show what you are attesting to the truth and accuracy of the information listed in the online summary under penalty of perjury. The notary form is what you and the notary sign that you must then mail to the Board. Without the completed notary form accompanied by the online summary, your application is not complete and cannot be processed.

**Q: Can I complete and sign my application prior to graduating from Osteopathic Medical School?**

**A:** No. When you sign your application, you are attesting under penalty of perjury that you have completed your Osteopathic Medical education prior to actually completing it.

**Q: Can I submit my copy of my transcript?**

**A:** No. Original source documentation is required. Only the school you attended can provide original source certified documentation of your attendance and completion of all requirements. Please specify that the transcripts be sent directly to Osteopathic Medical Board of California or they will be rejected.

**Q: Can I submit my copy of my exam scores?**

**A:** No. Original source documentation is required. Only NBOME can provide certification of your exam scores. Please specify that the exam scores be sent directly to Osteopathic Medical Board of California or they will be rejected.

**Q: Do I have to pay the fee when I submit my application?**

**A:** Yes. The Board will return an application to an applicant that is not accompanied by the correct fee amount. Checks and money orders must be made payable to: Osteopathic Medical Board of California or OMBC.

**Q: Under what circumstances would the Board return my application to me?**

**A:** The application was incomplete and missing required information or you did not pay the appropriate fee. Please make sure you complete all of the information.

**Q: Can I pay a fee to have my license application expedited?**

**A:** No. The Board reviews applications in the order in which they are received. You cannot pay a fee to expedite the review of your application. When deciding when to apply, please allow sufficient time for all your documents to be received and reviewed by the Board, particularly if you have a deadline for licensure or the issuance of a PTL.

**Q: What are the time frames for getting licensed?**

**A:** To be considered an applicant, you must submit both the application and the application fee. All application forms and supporting materials are stamped with the date and time they are received in the office. Incomplete applications will be returned to applicant to resubmit a completed application. Once a complete application and the application fee have been received, the application is reviewed for completeness. After the initial review is completed, the applicant is notified in writing of the application status and given an itemized list of documents needed to complete the file. It is the applicant's responsibility to ensure that any missing documents are sent to the Board. These subsequent documents also will be reviewed in order of receipt. The length of time it takes to obtain a license is related to how long it takes for all required documents to be received at the Board. Once the application is complete and approved, a license will be issued promptly.

**Q: How will you know if there are missing documents or other issues with my application?**

**A:** You will be notified if there are any missing documents or issues with your application once the application is reviewed. You will receive a deficiency letter from the Board.

**Q: If I apply online, do I still have to mail in the signed and notarized form with my photos and my application summary as proof of application?**

**A:** Yes. You must download the notary form, print the summary of your online application and bring it with you to when you sign the form in the presence of a notary. Then, mail both the application summary and the completed notary form along with the passport quality photos to the Board.

**Q: Can you call or email Board staff if I have questions or want to check on my application status?**

**A:** You may call or email your analyst. Calls and emails are returned in the order received and will most likely take one or more days before they are returned due to the high volume of calls and emails received. Please be patient and do not leave multiple messages regarding the same

issue. In addition, please note that the Board's analysts have a heavy application work load and each call or email takes away from time available to review applications and documents. You will be notified if there are any missing documents or issues with your application.

**Q: How long do I have to complete the application process?**

**A:** You have one year from the date the application was received by the Board to complete your application. Applications incomplete after 1 year are considered "abandoned" and may be destroyed (including all supporting documentation). If your previous application was abandoned, any subsequent application will be treated as a new application and you will be required to meet all licensure requirements in effect at the time of the subsequent application. You must also resubmit all required documentation (including new fingerprints) and pay the application fee.

**Q: How long will it take to receive my pocket license once issued?**

**A:** Please allow 2-4 weeks from the date of issuance to receive your pocket identification card.

**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 the following: 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 all residency programs attended and completed.

**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.

**A:** However, if an applicant holds an unlimited license as a physician and surgeon in other state(s) for a period of one year 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. They will be required to obtain a postgraduate training license and pay the non-refundable application and processing fee \$491 and \$49 non-refundable fingerprint fee.

## **PROGRAM DIRECTOR 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: What role does the residency training program have in their residents applying for a postgraduate training license?**

**A:** The program must download the Postgraduate Training License Enrollment form OMB.23 from the Board's website, complete it with a photo of applicant attached and the program seal affixed or program director's signature notarized that is mailed directly to the Board.

**A:** The program director must also download the Postgraduate Training Program Update form OMB.24 documenting any changes in status of the trainee within 30 days and mail directly to the Board.

**A:** The program director must download the Postgraduate Training Program Certification form OMB. 25 from the Board's website, complete it and sign it with program seal affixed or notarized and mail directly to the Board for each graduate of their 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 to continue in a residency program or practice in California.

### **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 downloadable on the Board's website [www.ombc.ca.gov](http://www.ombc.ca.gov) 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 or cancel the license if necessary.

### **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.

### **Q: What happens if a resident changes residency programs each year, so they do not have 24 consecutive months in the same residency program?**

**A:** Under the new law residents are required to complete 36 months, 24 months of those months at the same residency program. If residents do not meet this requirement, they are ineligible for licensure in California. Their options include completing an additional residency year in the



same program, so they meet the 24 month requirement; or, they will have to be licensed in another state and apply for reciprocity licensure in the future.

For more information, contact the Osteopathic Medical Board of California

Website: [www.ombc.ca.gov](http://www.ombc.ca.gov)

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