



MEDICAL BOARD OF CALIFORNIA

Protecting consumers by advancing high quality, safe medical care.

Licensing Program

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Gavin Newsom, Governor, State of California | Business, Consumer Services and Housing Agency | Department of Consumer Affairs

Senate Bill 798 Postgraduate Training and Licensing Changes **Effective January 1, 2020**

Frequently Asked Questions (FAQs)

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

A: A graduate from a Board-approved medical school who has not already completed 36 months of accredited training, does not hold a physician's and surgeon's license, and is accepted in an Accreditation Council for Graduate Medical Education (ACGME) accredited postgraduate training program in California.

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

A: A resident must obtain a PTL within 180 days after enrollment in an ACGME-accredited postgraduate training program in California in order to continue in the program.

Q: Will international medical school graduates require a Postgraduate Training Authorization Letter (PTAL) to participate in an ACGME-accredited postgraduate training program in California?

A: No, effective January 1, 2020, PTAL's are no longer required or issued for international medical school graduates. United States, Canadian, and international medical school graduates are required to obtain a postgraduate training license within 180 days of enrollment in an ACGME-accredited postgraduate training program in California.

Q: What happens to an applicant with an active or current Postgraduate Training Authorization Letter (PTAL)?

A: Applicants who were issued a PTAL by the Board prior to January 1, 2020, and are enrolled in a Board-approved postgraduate training program by April 30, 2025, will be issued a postgraduate training license upon receipt of the Enrollment Form, Form EF, from the current program director.

Q: What happens if an applicant is already enrolled in an ACGME-accredited training program in California on January 1, 2020?

A: If the physician's and surgeon's license was not issued by December 31, 2019, the applicant will be subject to the new law requiring 36 months of Board-approved postgraduate training. The 36 months of postgraduate training must consist of at least 24-continuous months of training within the same program.

Current first and second year residents enrolled in an ACGME-accredited California training program must obtain a PTL by June 30, 2020.

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

A: Applicants may apply for a postgraduate training license as soon as the applicant has graduated from medical school, completed United States Medical Licensing Examination (USMLE) Step 1, 2CK, and 2CS, and received confirmation of acceptance into an ACGME-accredited postgraduate training program in California. At that time, the program director is required to submit the Postgraduate Training License Enrollment Form, Form EF, directly to the Board.

Q: How much is the initial application fee for a Postgraduate Training License?

A: The non-refundable initial application and processing fee is \$491. The fee is not required if the applicant has an open application with the Board.

Q: Is the program required to submit documentation to the Board regarding residents that are participating in their program?

A: Yes, for the PTL to be issued, the program director will be required to submit the Postgraduate Training License Enrollment Form, Form EF, directly to the Board to verify that the resident is enrolled in an ACGME-accredited program in California.

Once the PTL is issued, the program director must notify the Board within 30 days of any status changes that would affect the resident's anticipated end date of the program, such as the resident transfers to another program, is terminated, resigns, is placed on probation and/or completes remediation, or takes a leave of absence. The PTL expiration date may have to be updated based on the new anticipated end date of the program.

Q: Will a resident be issued any proof that he or she possess a Postgraduate Training License and will it be made public?

A: Yes, a pocket card will be issued to the resident, which will identify that the resident holds an approved postgraduate training license and the information will be displayed on the Board's website. The pocket card and the Board's website include the name of the training program and the dates of training allowed under the PTL.

Q: How long is a Postgraduate Training License valid and what circumstances can affect the validity of the PTL?

A: The expiration date of a postgraduate training license is determined on a case-by-case basis. For example, if the applicant completes an ACGME-accredited internship or transitional year and applies for a postgraduate training license, the validity of the license will be adjusted based on the amount of credit granted during the previous program. It may also be adjusted for program status changes, such as remediation or a leave of absence.

Additionally, the postgraduate training license may be valid for up to 39 months if the resident is enrolled in an ACGME-accredited residency program in California. This allows the resident to complete the 36 months of required training for licensure and grants the resident 90 days to obtain the physician's and surgeon's license while they continue their training. If the physician's and surgeon's license is not issued by the end of the 90-day grace period, all clinical services in California must cease.

Q: Are applicants required to renew their Postgraduate Training License?

A: No, the postgraduate training license is not renewable. However, the program director must notify the Board within 30 days of any status changes that would affect the resident's anticipated end date of the program, such as if a resident transfers to another program, is terminated, resigns, is placed on probation and/or completes remediation, or takes a leave of absence.

Q: What duties may a holder of a Postgraduate Training License perform?

A: The holder of a postgraduate training license may engage in the practice of medicine only in connection with his or her duties as a resident in an ACGME-accredited postgraduate training program in California, including its affiliated sites, or under those conditions as are approved in writing by the director of his or her program. Duties include, but are not limited to, the following:

- Diagnose and treat patients.
- Prescribe medication without a cosigner, including prescriptions for controlled substance, if the licensee has the appropriate Drug Enforcement Agency registration or permit and is registered with the Department of Justice *Controlled Substance Utilization Review and Evaluation System* (CURES).
- Sign birth and death certificates without a cosigner.

Q: Can the holder of a Postgraduate Training License be issued a Drug Enforcement Agency (DEA) controlled substance permit?

A: The Board has confirmed with the DEA that a resident can apply and be issued a controlled substance permit once he or she has obtained a postgraduate training license. For more information, visit the [DEA's](#) website.

Q: Is a holder of a Postgraduate Training License who has a valid DEA Controlled Substance Permit required to consult the Controlled Substance Utilization Review and Evaluation System (CURES)?

A: Yes, the CURES registration policy and requirements apply to a postgraduate training license holder. For more information, visit the [Board's](#) website.

Q: Can a holder of a Postgraduate Training License request enrollment as a Medi-Cal fee-for-service provider?

A: Yes, a holder of a postgraduate training license can request enrollment as a Medi-Cal fee-for-service provider. For more information, visit the [Department of Health Care Services', Medi-Cal](#) website.

Q: Can a holder of a Postgraduate Training license obtain an "X-License" or "Fluoroscopic Permit?"

A: No, the California Department of Public Health requires a full and unrestricted physician's and surgeon's license in order to obtain an "X-License" or "Fluoroscopic Permit." For additional information, visit the California [Department of Public Health website](#).

Q: Can a holder of a Postgraduate Training License who has a valid DEA Controlled Substance Permit / License prescribe Suboxone (Buprenorphine and Naloxone)?

A: The holder of a postgraduate training license who has a valid DEA Controlled Substance Permit / License can prescribe Suboxone only after obtaining proper certification through the Substance Abuse and Mental Health Services Administration (SAMHSA). This information can be accessed by visiting the [SAMHSA](https://www.samhsa.gov) website.

Q: Can a resident 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 a resident in an ACGME-accredited postgraduate training program in California, 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: Can a Postgraduate Training License be subject to discipline by the Board?

A: Yes, a postgraduate training license is subject to the same disciplinary process and actions as a physician's and surgeon's license. This means that the Board may deny an application for a PTL, issue a probationary PTL, or take disciplinary action against the license.

Q: Is the program required to inform the Board of any status change for residents enrolled in their program?

A: Yes, programs are required to notify the Board, within 30 days, of any status changes that would affect the resident's anticipated end date. The current program director must submit a Program Status Update/Change Form, Form PSU1-PSU2, directly to the Board. Status changes may include, but are not limited to, the resident transfers to another program, is terminated, resigns, is placed on probation and/or completes remediation, or takes a leave of absence. This notice will allow the Board to adjust the expiration date of the postgraduate training license, if necessary.

Q: How many years of postgraduate training is required to qualify for a physician's and surgeon's license in California?

A: To qualify for licensure in California, an applicant must have completed 36 months of Board-approved postgraduate training. The Board accepts training programs accredited by the Accreditation Council for Graduate Medical Education (ACGME) in the United States, the Royal College of Physicians and Surgeons of Canada (RCPSC), or the College of Family Physicians of Canada (CFPC) in Canada. The 36 months of training must include four months of general medicine and consist of at least 24-continuous months of training within the same program.

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

A: The applicant must submit an Application to Transition from Postgraduate Training License to a Physician's and Surgeon's License with the required licensing fees, verification of a passing score on USMLE Step 3, and a Certificate of Completion of ACGME Postgraduate Training form from the program signed after completing 36 months of training to verify successful completion. Residents may submit the transition application up to 120 days prior to completion of the 36 months of Board-approved training.

Q: When do I apply for my physician's and surgeon's license?

A: A postgraduate training license holder should apply for their physician's and surgeon's license approximately 120 days prior to completing the required 36 months of Board-approved postgraduate training. The three years of postgraduate training must consist of at least 24-continuous months of training within the same program. To transition from a PTL to a full license, the PTL holder shall complete the following:

- Submit the Application to Transition from a PTL to a Physician's and Surgeon's License, Forms TF1-TF4, with the initial licensing fee.
- Request Transcript of Scores from the Federation of State Medical Board (FSMB) to document passage of United States Medical Licensing Examination (USMLE) Step 3.
- Request a Certificate of Completion of ACGME, RCPSC, or CFPC Postgraduate Training, Form PTA-PTB, from the current program director, to be signed after completing 36 months of training to verify successful completion.

Q: Does an applicant need to be licensed to commence training in a fellowship in California if they have already completed 36 months of approved ACGME, RCPSC, or CFPC accredited training?

A: No, the applicant may commence training in an ACGME-accredited fellowship in California without the license. However, the applicant must obtain a physician's and surgeon's license within 90 days of the enrollment date. If a license is not granted within the 90 days, the applicant must cease all clinical activities in California until the license is issued.