COMMONWEALTH OF MASSACHUSETTS BOARD OF REGISTRATION IN MEDICINE POLICY 2019-05

August 8, 2019

Amended March 11, 2021

Amended September 9, 2021

Amended July 18, 2024

Amended June 12, 2025

POLICY ON APPROVING INITIAL FULL, LIMITED AND TEMPORARY LICENSE APPLICATIONS

All applications for licensure filed pursuant to M.G.L. c. 112, §§ 2 through 9B, shall be approved by the Board of Registration in Medicine ("Board").

The Licensing Committee, a Committee of the Board, has been established to assist the Board in reviewing applications filed pursuant to M.G.L. c. 112, §§ 2 through 9B. It is the Policy of the Board that the Licensing Committee shall review initial full, initial limited, limited license renewal or temporary applications when the license application raises questions regarding an applicant's qualifications, competency or good moral character. The Board authorizes the Executive Director or other designee to determine that applications do not require review by the Licensing Committee in the following instances:

Disciplinary Action in College/Pre-Medical Education

* Minor disciplinary action, not to include suspension, dismissal, expulsion or its equivalent.

Disciplinary Action in Medical School

* Successful remediation of coursework in medical school without further disciplinary action.

Remediation in Postgraduate Training

* Remediation during postgraduate training followed by two or more years of successful postgraduate training or two or more years of independent practice (supported by good Supervisory Evaluation(s) in which the applicant is rated as "average" or above in all categories and recommended for licensure without reservation).

Leave of Absence or Extended Period of Time in Medical School or Postgraduate Training Program

* Extended period of time or leave of absence in medical school or postgraduate training, for the following reasons, but not to include any leave related to disciplinary action or in lieu of disciplinary action:
  + To participate in research;
  + To obtain additional advanced degrees;
  + Maternity or paternity leave;
  + Medical leave of absence where there has been no impact on the applicant's ability to practice medicine;
  + To care for a sick family member;
  + Financial reasons;
  + To study for USMLE or COMLEX exams;
  + To provide humanitarian assistance or other public service; and/or
  + To participate in decelerated medical school curriculum.

Withdrawal from Medical School or Postgraduate Training Program

* Withdrawal or transfer to another medical school or postgraduate training program in good standing, not related to disciplinary action or in lieu of disciplinary action.

Medical or Physical Condition

* Medical or physical condition which has no impact on the applicant's ability to practice medicine.

Criminal History

* One criminal offense to include only the following:
  + Acts of Civil Disobedience (no property damage, no personal injury)
  + Underage drinking or possession of alcohol
  + Open Container violations
  + Disturbing the Peace (no property damage, no personal injury)
  + Noise Infractions
  + Hunting/fishing/boating violations
  + Single count of Reckless Driving

Malpractice History

* Malpractice history which would not require review pursuant to Board Policy 2019-04

Requests for Waivers

* Joint degree waivers of the Board's Seven Year Rule (i.e., MD/PhDs who complete all three Steps of the USMLE or all three Levels of COMLEX in less than 10 years) and complete the MD/PhD during the total exam period).
* All other waivers of the Board’s Seven Year Rule for applicants who:
  + Passed all three Steps of the USMLE or all three Levels of the COMLEX on their first attempt; or
  + Required more than seven years to complete the all three Steps of the USMLE or all three Levels of the COMLEX due to delays arising from the COVID-19 pandemic.
* Waivers of substantial equivalency of medical education for graduates of medical schools that the Board/Licensing Committee has previously approved.
* Waivers of the Board’s postgraduate training requirements for applicants who have completed two or more years of non-accredited subspecialty clinical fellowship training at a facility which conducts ACGME, AOA or Canadian accredited training in the parent specialty.

Temporary Licenses

* The following temporary licenses, provided that the license application does not contain responses that would warrant review by the Licensing Committee as otherwise set forth in this Policy:
  + Visting Short-Term Faculty Temporary License applications pursuant to Policy 93-01;
  + Continuing Medical Education Course Temporary Physician License applications; and
  + Substitute Coverage Temporary Physician License applications.

Previously Considered by the Licensing Committee and/or Board

* Any matters previously considered by the Licensing Committee and/or the Board where there is no new information, which would warrant review under this Policy.

Staff retains the authority and discretion to present any application to the Licensing Committee should staff believe that review of the application is warranted. It is the expectation of the Board that, when in doubt, staff will present an application for review to the Licensing Committee.

The Licensing Committee, in its review of applications for initial full, limited and temporary licensure, may conduct an interview, may request additional documentation, may refer an applicant for an evaluation of health concerns to a Board-approved entity, and may recommend actions to the Board.

Complete applications for initial full, limited and temporary licensure that do not raise questions regarding an applicant's qualifications, competency, or good moral character requiring review by the Licensing Committee shall be approved by the Board at a duly noticed meeting of the Board.

In the absence of a duly noticed Board meeting, the Board, through this Policy, authorizes the Executive Director to approve complete applications for initial full, limited and temporary licensure when the license application does not raise questions regarding an applicant's qualifications, competency, or good moral character requiring review by the Licensing Committee. These licenses will be approved *nunc pro tunc* by the Board at the next scheduled Board meeting.