COMMONWEALTH OF MASSACHUSETTS BOARD OF REGISTRATION IN MEDICINE

POLICY 2023-03

POLICY ON PROVISIONALLY ISSUED FULL LICENSES FOR QUALIFIED APPLICANTS

Issued September 21, 2023

In order to ensure an adequate supply of physicians to staff hospitals, and to eliminate any administrative delays for physicians who qualify for full licensure, the Board of Registration in Medicine will *provisionally* issue a full license to qualifying full license applicants who meet specific criteria. The provisionally issued full license will allow qualifying full licensees to practice medicine in Massachusetts while the Board completes the administrative review of the application.

1. This policy shall apply in those instances where:
   1. an applicant has submitted a Full License Application and application fee, and
   2. A Massachusetts healthcare facility (as defined by M.G.L. c. 111, § 1) has made a request to the Board’s Executive Director or Director of Licensing for issuance of a provisional license to the applicant.
2. Where the criteria in paragraph 1a and 1b have been met, the Board will conduct a review of the application and supporting documentation to determine if all of the following provisional full license qualifying criteria have been met:
   1. The application includes an FCVS Physician Profile which includes the following information
      1. Official examaination scores (USMLE, FLEX, COMLEX, LMCC, etc.);
      2. Verification of all medical education
      3. Verification of all U.S. and Canadian postgraduate training, including any non- accredited postgraduate training;
      4. National Practitioner Data Bank report; and
      5. ECFMG Certificate, an international medical graduate.
   2. The applicant meets all statutory requirements for full licensure set in M.G.L. c. 112 except to the extent that primary source documentation not yet received by the Board may verify; and
   3. The Full License Application either
      1. does not require Licensing Committee review pursuant to 243 CMR 2.00 and Policy 19-05, or
      2. has been approved by the Chair of the Board or his designee.
3. If the criteria in paragraphs 1 and 2 have been met, the Board will provisionally issue a full license to the applicant. This provisionally issued full license shall be valid until either the Board approves the full license, or the Board has cancelled the provisionally issued license in accordance with this policy. Written notice of approval, or cancellation, will be sent to the applicant. Written notice may consist of a letter or an email sent to the applicant at an email address provided by the applicant on his or her application.
4. At any point prior to the Board issuing written notice that the full license has been approved, the Board may cancel a provisionally issued full license on any of the following bases:
   1. The Board does not receive required primary source documentation within 90 days of the the provisional license issue date and the Board cannot otherwise verify to its satisfaction the information that the primary source documentation would have verified;
   2. The Board receives the required primary source documentation and the Board determines that it is materially inconsistent with information provided by the applicant in connection with the application; or
   3. The Board receives additional information that warrants review by the Licensing Committee pursuant to 243 CMR 2.00 and Policy 19-05;
5. The applicant must cease all clinical activities immediately upon receipt of written notice from the Board of cancellation of the provisionally issued full license.

6. A provisionally issued full license may be disciplined by the Board at any time for any of the grounds that would subject the holder of a physician’s license to discipline in Massachusetts.