

# Postgraduate Training License (PTL)

May 10, 2021



## OVERVIEW

Today, roughly 1,370 community health centers (CHCs) in California provide high-quality comprehensive care to 7.4 million people or 1 in 5 Californians. To alleviate shortages in the physician workforce, CHCs serve as Teaching Health Centers (THCs) and training sites for hospital-based residency programs. There are over 40 CHCs with over 1300 residents training in California's most diverse communities.

## THE PROBLEM

SB 798 (Hill), signed by Governor Brown in 2017, revised physician postgraduate training and licensing requirements. Effective January 1, 2020, all residents who apply for a medical license, regardless of whether the graduate medical school attended was domestic or international, are required to successfully complete 36 months of residency training. Residents must obtain a postgraduate training license (PTL) within 180 days of program enrollment. The Department of Consumer Affairs temporarily extended the deadline for residents to obtain their PTL to June 30, 2021 due to the COVID-19 public health emergency.

CHCs and health care partners working closely with residency programs identified several areas where the new licensing structure does not align with federal and state requirements. These discrepancies created significant challenges for residents to train and CHCs to meet health care delivery needs during the COVID-19 pandemic. Some of the detrimental effects include:

- **Ineligibility to enroll and bill Medi-Cal for moonlighting services** – Federal regulations exclude providers with restricted licenses from enrolling in Medi-Cal. Thus, residents with the PTL cannot bill Medi-Cal while they are moonlighting – a secondary job to gain training and income. CHCs also rely on moonlighting residents to close the physician workforce gap and care for patients in medically underserved areas. Consequently, fewer moonlighting opportunities are being offered to residents, which disincentivizes applicants for California residency programs, decreases Medi-Cal patients' access to care, and widens the physician shortage.

- **Inability to obtain a Substance Abuse and Mental Health Services Administration (SAMHSA) Drug Enforcement Agency X-Waiver** – Residents are experiencing challenges obtaining a X-waiver to treat opioid use disorders because the PTL is a restricted license.
- **Requirement to Extend Program** – If residents take time away from their residency program, they will have to extend their training even if they are deemed competent by their program director because of the strict 36-month training requirement. This conflicts with national specialty board family and medical leave policies. It also creates significant challenges with contracts, start dates for fellowships and employment, etc.

California is experiencing a physician workforce crisis. The PTL, a restricted license, is an increasing challenge and unnecessary barrier for residents to train and be employed in California during and after the pandemic.

## THE SOLUTION

Prior to the implementation of SB 798, a PTL did not exist, and an unrestricted license could be obtained:

- After 12 months for domestic medical school graduates, and
- After 24 months for international medical school graduates.

Residents were previously able to hold an unrestricted license allowing them to moonlight and obtain a X-waiver, which expanded access to health care.

**California must eliminate the PTL and allow residents in accredited residency programs to obtain an unrestricted physician and surgeon license after completing 12 or 24 months of training for domestic medical graduates and international medical graduates respectively, which is consistent with the previous requirements for physician licensing in California.**

## FOR MORE INFORMATION

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## COMMUNITY HEALTH CENTER TALKING POINTS

### Community Health Centers Background

- Today, more than 1,370 community health centers serve the state of California and provide comprehensive, high quality care to 7.4 million people – or 1 in 5 Californians.
- Community health centers provide the full spectrum of care, from primary care to dental to behavioral health care and a variety of enabling and wraparound services.

### Postgraduate Training License (PTL)

- SB 798 (Hill), signed by Governor Brown in 2017, revised postgraduate training and licensing requirements for medical school graduates.
- A new Postgraduate Training License (PTL) is now required for all residents participating in an accredited postgraduate training program in California to practice medicine as part of their training program.

### The Problem – Please share examples of identified challenges below from PTL restrictions.

- The PTL and new licensing structures inhibit residents' training and delivery of care, interrupts health access in the COVID-19 pandemic, and does not align with federal regulations.
- PTL holders cannot enroll and bill Medi-Cal for moonlighting services because eligible providers do not have current licensing limitations under federal regulations (42 C.F.R. §455.412). This inability to bill for Medi-Cal and Medicare decreases residents' ability to earn additional income, train outside their program, and close the provider gap in rural and medically underserved communities.
- SAMHSA has declined applications for Drug Enforcement Administration X waiver due to PTL limitations and consequently, residents cannot provide medically assisted treatment to patients with opioid substance use.
- A strict 36-month training requirement for residents with the PTL conflicts with national specialty board and medical family leave policies, start dates for fellowships/contracts, and residents must extend their training.
- State government agencies have said these concerns cannot be fixed administratively.

### The Solution/Ask

- Prior to the implementation of the PTL, residents did not face these challenges because they could obtain an unrestricted physician and surgeons license after 12 or 24 months of residency training.
- For this reason, we request the elimination of the PTL through the 2021 Medical Board Sunset Review Process and the reinstatement of the previous physician licensing structure to ensure patient access to care and support for California's current and future workforce.