

**UNIVERSITY HEALTH CARE
HOSPITALS AND CLINICS**

GRADUATE MEDICAL EDUCATION

HOUSESTAFF POLICIES AND PROCEDURES

**MEDICAL LICENSE, CONTROLLED SUBSTANCE, DEA NUMBER AND NPI
NUMBER**

Section 1 No. 1 Rev.16 Review Date: March 2009 Revision Date: March 2009
Chapter: Conditions for Employment

I. PURPOSE

All house officers are required to obtain a Utah medical license, a National Provider Identifier (NPI), a Utah controlled substance license, and a Federal DEA registration to participate in a training program at the University of Utah Affiliated Hospitals, in accordance with the policy herein. The NPI is the standard unique identifier for healthcare providers. Once issued, the NPI will remain with the provider regardless of job or location changes.

II. POLICY

All house officer MDs are required to pass Steps 1, 2 (CK and CS), and 3 of the United States Medical Licensing Exam (USMLE) (or equivalent exams for DOs and DPMs) and to obtain a Utah medical license, National Provider Identifier (NPI), Utah controlled substance license, and Federal DEA registration (as applicable). The Graduate Medical Education Committee may grant Administrative Variances of this policy in specific instances. Any house officer who does not comply with this policy, or who is ineligible for licensure at the required time as set forth in this policy, without having been granted an Administrative Variance, will be subject to disciplinary action and or termination as dictated by the Graduate Medical Education Committee.

III. PROCEDURE

A. *POST-GRADUATE YEAR ONE (PGY-1) RESIDENTS*

1. **PGY-1 EXAM REQUIREMENTS**

All post-graduate year one (PGY-1) residents are required to pass Steps 1 and 2 (CK and CS) of the USMLE (or equivalent exams for DOs and DPMs) prior to beginning residency training, and **must show evidence of**

that as part of the credentialing process. All PGY-1 residents are required to take and pass USMLE Step 3 (or equivalent exam for Dos and DPMs), receive scores, and **provide evidence of a passing score** to the Graduate Medical Education Office by the last day of their PGY-1 year.

2. PROGRAM DIRECTOR RESPONSIBILITIES

- a. Program Directors are expected to obtain verification from applicants to programs that they have passed Steps 1 and 2 (CK and CS) of the USMLE (or equivalent exams for DOs and DPMs) prior to the beginning of the residency.
- b. Accepted or matched PGY-1 residents who have not taken or passed Steps 1 and 2 (CK and CS) will be released from their contract.
- c. Program Directors are expected to obtain verification from all PGY-1 residents in their programs that they have taken, passed, and received scores of Step 3 of the USMLE (or equivalent exam for DOs and DPMs) during the PGY-1 year.
- d. The Program Director, Program Coordinator, or PGY-1 resident must provide the Graduate Medical Education Office with evidence of passing all required exams before the last day of the resident's PGY-1 year.

B. POST-GRADUATE YEAR TWO (PGY-2) AND HIGHER RESIDENTS

1. PGY-2 AND HIGHER APPLICATION REQUIREMENTS

- a. All post-graduate year two (PGY-2) residents and all new incoming residents at level PGY-2, must be eligible for a Utah medical license, a Utah controlled substance license, and a Federal DEA registration. All PGY-2 residents must submit their completed application by the time guidelines outlined below and are responsible for all necessary follow up to ensure they obtain their licenses in a timely manner.
- b. **All PGY-3 and higher residents and fellows must be fully licensed by their hire date. PGY-3 and higher residents and fellows who are not licensed by their hire date will not be allowed to start until they are fully licensed.**

2. PROGRAM DIRECTOR RESPONSIBILITIES

- a. Program Directors and/or Program Coordinators will verify that all residents at level PGY-2 are eligible to apply for medical licensure by having taken and passed Steps 1, 2 (CK and CS) and 3 of the USMLE (or equivalent exams for DOs and DPMs). **They will also verify that all PGY-3 and higher residents are fully licensed prior to hire date.**
- b. Incoming residents at level PGY-2 or above who have not taken and passed USMLE Steps 1, 2 (CK and CS), and 3 (or equivalent exams for DOs and DPMs) will not be accepted into the program unless there is a justifiable reason for an exception to this policy.
- c. If a resident at level PGY-2 or higher is not eligible to apply for medical licensure, the Program Director must notify the Graduate Medical Education Committee and petition that body for an Administrative Variance for the resident to begin the training program.
- d. **If a PGY-3 or higher is not licensed by the hire date, the Program Director must notify the Graduate Medical Education Committee and petition that body for an Administrative Variance for the resident to begin the training program.**

3. APPLICATION DEADLINES AND FEES

- a. All PGY-2 residents will submit a completed FCVS credentialing application (MDs and DOs only) and a completed Utah medical license application to the Graduate Medical Education Office by July 31 of the PGY-2 year, or within 30 days of hire.
- b. **All PGY-3 or higher must already be fully licensed by date of hire.**
- c. All FCVS credentialing and Utah medical license applications submitted by the stated deadline will be paid for by the Graduate Medical Education Office.
- d. Failure to submit a completed FCVS credentialing application and Utah medical license application by July 31 or within 30 days of hire will result in immediate suspension without pay. Suspended residents may be reinstated upon submission of a

completed application.

- e. PGY-2 residents who fail to submit a completed FCVS credentialing application (MDs or DOs only) and Utah medical license application by July 31 of the PGY-2 year, or within 30 days of hire, must pay the entire cost of both the FCVS credentialing and the Utah medical license.
- f. All PGY-2 or PGY-2+ residents will apply for a Federal DEA registration (as applicable) immediately upon receiving a Utah medical license.

4. LICENSING DEADLINES AND COPY REQUIREMENTS

- a. It is the responsibility of the resident to follow through as needed to ensure licensure in a timely manner. This may include contacting FCVS, the Utah Board, prior educational or training institutions, previous employers, or the Graduate Medical Education Office. Residents who do not follow through as necessary may be subject to disciplinary matters, including suspension.
- b. Copies of the Utah medical license, Utah controlled substance license, and Federal DEA registration must be submitted to the Graduate Medical Education Office within 30 days of receipt.

5. PROGRAM EXEMPTIONS FOR DEA LICENSE

- a. Some programs are specifically exempted from the Utah controlled substance license and Federal DEA registration requirements for housestaff. In these exempted programs, housestaff are still required to apply for and obtain a Utah medical license as outlined in this policy. Exempted programs are as follows: Anesthesiology, Dental Education, Pathology, Pathology Specialties, Neurogenetics, Radiology, Pediatric Critical Care and Neuroradiology.

6. TRAINING UNDER A DISCIPLINARY ACTION

- a. The Graduate Medical Education Committee will consider each request from a Program Director to allow a resident who is ineligible for licensure or who has not met licensure requirements to begin training.

- b. The Graduate Medical Education Committee will make a decision whether to allow the resident to begin training under the terms of an Administrative Variance.
- c. If the Graduate Medical Education Committee grants an Administrative Variance to this policy, the resident may begin training under the terms of the Variance. The resident and the Program Director will be notified in writing regarding the length and terms of the Variance. At the end of the Variance period, the resident must have met all terms of the Variance granted. Administrative Variances will not be reported to other agencies.

7. CONSEQUENCES OF FAILURE TO SATISFY REQUIREMENTS

- a. Accepted or matched PGY-1 residents who have not taken or passed Steps 1 and 2 (CK and CS) (or the equivalent for DOs and DPMs) will be released from their contract. No administrative variances will be awarded.
- b. Any PGY-2 or PGY-2+ resident who is training under the terms of an Administrative Variance granted by the Graduate Medical Education Committee, and who does not meet the terms of that Variance, may be dismissed from the training program by the Program Director. If the Program Director does not wish to dismiss the resident, the Program Director must notify the Graduate Medical Education Committee and petition that body for permission to allow the resident continue in the training program. The Graduate Medical Education Committee may grant a second Administrative Variance or dismiss the resident from the training program. The Administrative Variance will include terms and conditions by which the resident must abide and will be provided in writing to the resident and the Program Director.
- c. Failure of a resident to meet the terms and conditions of a second Administrative Variance will result in dismissal of the resident from the training program with no option to appeal.
- d. Any resident who is dismissed from a training program for failure to meet licensure requirements may re-apply to that program following successful completion of the requirements. Re-acceptance into a program is at the discretion of the Program Director.

C. FELLOWS

- a. All eligible incoming Fellows must obtain a Utah medical license, a Utah controlled substance license, and a Federal DEA registration (as applicable) prior to beginning his/her fellowship at the University of Utah. Upon notification by the hiring School of Medicine Department, the Graduate Medical Education Office will send a letter to each incoming fellow that describes the licensure process in Utah, gives the web address for all required applications, and provides detailed instructions for ensuring a smooth licensure process. The letter will also include information regarding reimbursement of licensure costs.
- b. Fellows who are ineligible to apply for licensure prior to the anticipated start date of their training may be granted an Administrative Variance upon request from the Program Director. The same procedures and requirements as above will apply.

D. WAIVERS OF THE LICENSE REQUIREMENT

- a. The Graduate Medical Education Committee may grant waivers of the medical license policy in specific instances. If a house officer is an international medical graduate with no prior residency training in the United States, or is unable to comply with the licensing policy due to overriding concerns or issues deemed by the Graduate Medical Education Committee to be substantial, the Committee may waive the medical license requirement for one year. The Program Director and the resident will be notified in writing of such a waiver, and the waiver will be documented in the resident's file.
- b. Waivers of the medical licensing requirements are at the sole discretion of the Graduate Medical Education Committee and should not be assumed to be automatic under the circumstances stated above.

E. LICENSE RENEWALS

- a. All Utah MD licenses expire January 31 in even years, Utah DO licenses expire May 31 in even years, and Utah Podiatric licenses expire September 30 in even years. Housestaff are responsible for renewing their licenses prior to the expiration date. **Failure to do so will result in immediate suspension**

without pay. Suspended housestaff will be readmitted to the program upon proof of renewal. The Graduate Medical Education Office will reimburse for the full cost of license renewal if the resident is continuing on in the subsequent training year and renews prior to the expiration date. The Graduate Medical Education Office will reimburse for half the license renewal cost if the resident is completing his/her training in the current training year and renews prior to the expiration date. The GME office will not reimburse for licenses renewed after the expiration date.

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