

# The Massachusetts Physician Pathway Act

An Act improving healthcare delivery for underserved  
residents of the Commonwealth

**Signed into Law November 20, 2024**

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## Summary of the New Law

**The Physician Pathway Act** will mobilize the expertise of experienced internationally-trained physicians to address physician shortages in Massachusetts by creating a pathway to full licensure in exchange for at least 3 years of medical practice in an underserved community.

## The Pathway - 3 steps to full licensure

**The pathway** will allow eligible internationally trained physicians (ITPs) to be issued a renewable **1-year limited license** to practice medicine under **the mentorship** of a participating health center or hospital.

Upon successful completion, the ITP will be eligible for a renewable **2-year restricted license** to practice in a shortage area or specialty.

The ITP will then be eligible to apply for a **full unrestricted license** to practice medicine anywhere in the state.

The 1-year limited license and the 2-year restricted license are each renewable once.

# Mentorship Program: An alternative to residency

**The PPA** defines ITPs as physicians previously licensed or otherwise authorized to practice abroad, with a year or more of independent practice experience abroad.

**The requirement to complete a U.S.-based medical residency (GME)** for physician licensure is the most significant barrier to practice faced by ITPs, who must compete with recent medical school graduates for a residency match. **The PPA removes this requirement.**

**The PPA pathway** substitutes a 1-year assessment and evaluation program at a participating health care facility, where the ITP would practice under the limited license.

**The participating facility** will develop and evaluate the ITP's familiarity with non-clinical skills and standards appropriate for medical practice in Massachusetts.

**Participating health care facility:** a federally-qualified health center, community health center, hospital, or other healthcare facility **approved by the Board.**

## Step 1: Eligibility for Limited Licensure (1-2 years)

**The 1-year limited license** authorizes the ITP to practice medicine in a participating health care facility approved by the Board. It is renewable 1 time.

**To be eligible, an internationally-trained physician must have:**

1. Graduated from a legally-chartered medical school outside of the U.S. recognized by the World Health Organization;
1. Been previously licensed or authorized to practice outside the U.S. and have practiced independently for at least one year;
1. Obtained a valid certificate from the Educational Commission for Foreign Medical Graduates (ECFMG) or other credential evaluation service approved by the Massachusetts Board of Registration in Medicine;
1. Obtained a passing score on Step 1 and Step 2 CK of the U.S. Medical Licensing Exam; and
1. **Been accepted into a mentorship program with a participating healthcare facility, with an offer of full-time employment under the limited license.**

## Step 2: eligibility for a restricted license to practice in a Massachusetts physician shortage area

**The 2-year restricted license** authorizes the ITP to practice independently in a Massachusetts physician shortage area and specialty designated by the Board of Registration in Medicine. It is renewable one time.

### **To be eligible, an internationally-trained physician must have:**

- Successfully completed the participating facility's assessment and evaluation program
- Obtained a passing score on Step 3 of the USMLE
- Fulfilled any additional criteria that the Board may require (except postgraduate clinical training)

**After 2 years of practice under the restricted license, the ITP will be eligible to apply for a full, unrestricted license to practice anywhere in Massachusetts.**

## What makes the PPA distinctive

- **First bill filed in the nation** to provide a pathway to full physician licensure by removing the residency requirement for experienced ITPs.
- **Service requirement:** requires participating ITPs to practice for at least 3 years in underserved communities before being eligible for full physician licensure.
- **No repeat of clinical training:** ITP would practice independently while being familiarized with Massachusetts and U.S. practice environment, increasing the facility's capacity to take new patients and allowing it to bill for the physician's work. The new law eliminates the GME requirement for physician licensure. There is no requirement for formal supervision.
- **No "lookback" period:** Some states limit eligibility to ITPs who have practiced in their home country within a set prior time period. The PPA reflects the actual experience of ITPs in the U.S., who invest significant time preparing and taking the USMLEs, only to find out that residencies are unavailable to them.



# Implementation Steps

- The Massachusetts Board of Registration in Medicine will develop draft regulations with criteria for participating healthcare facilities and any new physician eligibility criteria. Under the new law, these criteria cannot include a requirement of U.S.-based postgraduate clinical training (GME)
- Once the Board issues draft regulations, public comment period begins
- The Board will issue final regulations
- Applications for limited licenses will become available

**The implementation process could take as long as a year**

# Frequently Asked Questions

## **When will the limited license be available, and when can I apply?**

- Implementation by the Board could take as long as a year. After final regulations are issued, the Board should begin accepting applications. Eligible ITPs must first be accepted into a mentorship program offered by a participating healthcare facility, with the expectation of full-time employment by the facility
- The facility and the ITP will then apply for the limited license together
- Once the limited license is issued, the ITP can begin practice under the mentorship of the participating facility

# Frequently Asked Questions

## **Which healthcare facilities will offer mentorship programs?**

- Participating healthcare facilities will be federally-qualified healthcare centers, community health centers, hospitals, or other healthcare facilities that are approved by the Board.
- To be approved by the Board, a healthcare facility must serve a region or population that comprises a Massachusetts physician shortage area.
- Participating facilities will need to demonstrate to the Board that they can provide a structured program with the capacity to develop, assess and evaluate the physician's familiarity with non-clinical skills and standards appropriate for medical practice in Massachusetts.
- The assessment and evaluation criteria must be developed and approved by the Board before a mentorship program can be offered.

# Frequently Asked Questions

## **What constitutes a physician shortage area?**

- A physician shortage area is a geographic region or population in Massachusetts that is experiencing a shortage of physicians, especially primary care physicians or psychiatrists, relative to population and need
- Physician shortage areas will be determined by the Board in consultation with the Massachusetts Department of Public Health
- Physician shortage areas may change over time

# Frequently Asked Questions

## **How many openings will there be for internationally-trained physicians to practice under the new pathway?**

- The number of openings will depend on the hiring needs of participating healthcare facilities
- We do not know how many healthcare facilities will elect to participate in the new pathway
- We do know that the need for physicians in Massachusetts is great

# Frequently Asked Questions

## **For ITPs who successfully complete a mentorship program under the 1-year limited license and successfully apply for the 2-year restricted license, what next?**

- An ITP who successfully completes a mentorship program and passes Step 3 of the U.S. Medical Licensing Exam may apply for a 2-year restricted license to practice medicine independently in any healthcare facility that serves a designated shortage area. This license is renewable once
- However, the ITP must practice in a primary care specialty, psychiatry or other speciality that may be approved by the board
- There are no other restrictions on scope of practice

# Frequently Asked Questions

## **What can I do now to prepare if I want to participate in the program?**

- Eligible internationally-trained physicians can prepare by obtaining a passing score on Step 1 and Step 2 CK of the U.S. Medical Licensing Exam
- Eligible internationally-trained physicians should also obtain a certificate from ECFMG or other credential evaluation service approved by the Board
- We do not yet know if the Board will approve an additional credential evaluation service

# Frequently Asked Questions

## How do I stay updated on developments during the implementation period?

- MIRA Coalition and African Bridge Network publish a joint newsletter called Physician Pathway News that will update subscribers on developments during the implementation period. [You may subscribe to this newsletter here](#)
- Once the Board of Registration issues final implementing regulations, you will be able to learn more about your eligibility and procedures [on their website](#)