

<p align="center"><b>The University of Alabama Hospital</b> Graduate Medical Education Policy and Procedure</p>	<p align="center">GMEC Approved Date: May 6, 2025</p>
<p align="center"><b>USMLE, COMLEX &amp; Licensure Requirements</b></p>	<p align="center">Next Review Date: Spring 2026</p>

**A. United States Medical Licensing Examinations (USMLE)**

- USMLE Step 2:** All residents/fellows with M.D. degrees, regardless of postgraduate year, must possess a passing score for the Clinical Knowledge part of Step 2 by completion of the third month after entering residency training at UAB. For example, if a resident/fellow begins the PG year on July 1st, the deadline for successful completion of the exam is September 30th of the same year. The Clinical Skills part of Step 2 was eliminated in 2021.
- USMLE Step 3:** All residents/fellows with M.D. degrees must possess a passing score for the USMLE Step 3 by completion of the fourth month of postgraduate year two. The first attempt at the exam must occur before the end of the PGY1 year. Notwithstanding the foregoing, if a resident/fellow transfers to UAB from a non-UAB program after PG year two, the resident/fellow must possess a passing score for USMLE Step 3 by completion of the fourth month after their transfer to UAB. (For example, if a resident/fellow begins the postgraduate year two on July 1st, the deadline for successful completion of the exam is October 31st of the same year.)

For further clarification, in the case of the Oral Maxillofacial Surgery, the resident must possess a passing score for USMLE Step 3 by the end of the PGY2 due to the program format.

**B. Comprehensive Osteopathic Medical Licensing Examination (COMLEX)**

- COMLEX Level 2:** All residents/fellows with D.O. degrees, regardless of postgraduate year, must possess a passing score for the Computerized Cognitive Evaluation parts of the COMLEX Level 2 by completion of the third month after entering residency training at UAB. **As of 2021, the Level 2 Performance Evaluation part has been suspended indefinitely.**
- COMLEX Level 3:** All residents/fellows with D.O. degrees must possess a passing score for the COMLEX Level 3 by completion of the fourth month of postgraduate year two. Notwithstanding the foregoing, if a resident/fellow transfers to UAB from a non-UAB program after postgraduate year two, the resident/fellow must possess a passing score for COMLEX Level 3 by completion of the fourth month after their transfer to UAB. (For example, if a resident/fellow begins the postgraduate year two on July 1st, the deadline for successful completion of the exam is October 31st of the same year.)

**C. Alabama Medical Licensure:** All residents/fellows (graduates of American and international medical schools) must apply for and obtain an unrestricted Alabama license to practice medicine as soon as they meet the minimum postgraduate training requirements stipulated by the Alabama Board of Medical Examiners. In addition, residents/fellows who are graduates of international medical schools must apply for and obtain a limited Alabama license no later than 18 months from the start of postgraduate training (PGY 1) and this limited license must be maintained until an unrestricted Alabama license is obtained, or they complete the program, whichever occurs first.

All residents/fellows will be required to demonstrate to the Graduate Medical Education Department that they have obtained and maintained a medical license (unrestricted and/or

limited) with the Alabama Board of Medical Examiners, after meeting eligibility requirements, but, in no event later than 18 months from the start of their postgraduate training. For further clarification, the license must be active no later than 18 months from the start of postgraduate training (and not delayed to become active on January 1<sup>st</sup> of the next calendar year). A copy of the resident/fellow's current unrestricted and /or limited medical license must be submitted to the Graduate Medical Education Department on an annual basis at the time the resident/fellow's contract is renewed for each academic year.

Failure to meet any of these licensing requirements will result in the resident/fellow being placed on administrative probation. Should the resident/fellow fail to meet the terms of the probation period, the resident/fellow's appointment will be revoked. Application forms for licensure may be obtained by contacting:

Alabama Board of Medical Examiners  
Medical Licensure Commission  
P. O. Box 946  
Montgomery, AL 36101  
(848 Washington Avenue, Montgomery, AL 36104)  
Telephone: (800) 227-2606

#### **D. Alabama Controlled Substances Certificate/DEA Number:**

An Alabama Controlled Substances Certificate (ACSC) and Drug Enforcement Administration (DEA) number is required in order for physicians to write inpatient or outpatient prescriptions for controlled substances. Residents/fellows may rely on the Hospital's institutional DEA number (with a unique suffix assigned to each resident/fellow) for the first 18 months of residency training, but not thereafter.

In clinical training programs where controlled substances are prescribed, each resident/fellow must register with the Drug Enforcement Administration (DEA) and obtain an individual DEA number and with the Alabama Board of Medical Examiners for an Alabama Controlled Substances Certificate (ACSC) when they obtain their Alabama license, but on no event, later than 18 months from the start of their postgraduate training. A copy of the DEA number and ACSC should be sent to the Graduate Medical Education Department. Registration forms for the Alabama Controlled Substances Certificate are included with application materials for licensure, and information on federal DEA registration is found at: <https://www.deadiversion.usdoj.gov/>

Residents/Fellows in a training program where controlled substances are not prescribed are not required to obtain a DEA number or ACSC. Residents/fellows in these programs cannot use another physician's DEA number or ACSC.

A list of residency training programs in which controlled substances are prescribed can be found in Appendix 4.

Failure to meet any of these requirements will result in the resident/fellow being placed on administrative probation. Should the resident/fellow fail to meet the terms of the probation period, the resident/fellow's appointment will be revoked.

Note: If you will utilize your personal DEA number only within the scope of your training program and **will not utilize it for external moonlighting purposes**, you are eligible for a fee exemption for your DEA registration. To request approval for fee exemption, complete and sign the form "Request for Fee Exemption-DEA Registration" and submit it to your Program Director, Department Chair and DIO for approval. Please contact the GME Office for additional information on this process.