

LEGAL UPDATES

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Massachusetts BORIM Issues Guidance for New Licensing Pathway

On November 20, 2024, as part of the Mass Leads Act, an expansive economic development bill, Massachusetts amended MGL c. 112 §9 to create a new pathway towards full medical licensure for internationally trained physicians. The goal was to address primary care shortages in Massachusetts’ underserved and rural communities. See: Massachusetts BORIM Sets Parameters for New Licensing Pathway.

On November 20, 2025, the Board of Registration in Medicine (BORIM) issued its Policy 2025-03: outlining the criteria for healthcare facilities seeking to participate in this pathway to expand their roster of psychiatrists and primary care physicians. Eligible healthcare facilities can apply to BORIM for approval of their program and once approved, hire eligible physicians.

Requirements for Participating Healthcare Facilities

The statute permits certain healthcare facilities to participate by hiring internationally trained physicians to provide primary care or psychiatry in physician shortage areas in Massachusetts. The BORIM policy provides the necessary specifications for facility eligibility requirements.

1. Types of eligible healthcare facilities

BORIM has provided an expansive list of facilities that may participate.

Federally qualified health centers

Community health centers

Community behavioral health centers

Hospitals licensed by the Massachusetts Department of Public Health (DPH) or operated by the Commonwealth of Massachusetts

Health centers or clinics affiliated with a hospital licensed by DPH or operated by the Commonwealth of Massachusetts

2. Other eligibility requirements

Facilities must be located in an area designated by the Health Resources and Services Administration (HRSA) of the U.S. Department of Health and Human Services as a Health Professions Shortage Area or a Medically Underserved Area/Population. Many Massachusetts communities qualify for these designations.

The internationally trained physician hired by the participating healthcare facility must specialize in primary care (internal medicine, family medicine, geriatrics, pediatrics) or psychiatry and practice at the facility full-time, and the facility must be in a physician shortage area.

Requirements for Physician Eligibility

Participating healthcare facilities must ensure that any internationally trained physician they wish to hire meets the statutory requirements for this limited license, including:

Holds the equivalent of a degree of Doctor of Medicine from another country.

Is licensed to practice medicine in another country.

Has practiced medicine for at least one year in primary care (internal medicine, family medicine, geriatrics, pediatrics) or psychiatry.

If the physician has not engaged in clinical practice for 24 or more consecutive months before applying for licensure, BORIM may require an additional onboarding program for the physician to establish clinical competence.

Holds a valid certificate issued by the Educational Commission for Foreign Medical Graduates (ECFMG).

Has passed both Step 1 and Step 2 Clinical Knowledge of the United States Medical Licensing Examination (USMLE).

Requirements for Assessment and Evaluation of the Program

The healthcare facility must provide a program for development, assessment, and evaluation of any internationally trained physicians hired through this pathway.

The participating healthcare facility must establish an assessment program that includes a framework for assessing, developing, and evaluating the physician's skills. The program must include a framework for assessing, developing, and evaluating the physician's skills. BORIM identifies three options for this framework:

The March 2025 Curriculum and Evaluation Plan Framework for Onboarding and Orienting International Medical Graduates, published by the Accreditation Council for Continuing Medical Education (ACCME).

The Assessment Framework and Recommendations set forth in the February 2025 Draft Preliminary Recommendations issued by the Advisory Commission on Additional Licensing Models (ACALM), which stated that the program may omit clinical competency development and assessment.

Program Framework Adapted from ACGME Core Competencies set forth in the addendum to BORIM's policy and ACGME milestones that correspond with these competencies.

The program must conduct an initial assessment of each participant within one month of BORIM issuing the physician a limited license, and again in the ninth month. Programs must submit the results of those assessments to BORIM before the physician's limited license expires at the end of one year.

Process for Seeking Approval as a Participating Healthcare Facility

A healthcare facility interested in setting up a program must apply to BORIM for program approval at least 90 days before the start date of the first physician or cohort. Each approval lasts for four years.

BORIM has not yet released the "International Pathway Participating Facility Approval Request Form." We will update this article when the request form is available.

What this means to you

This new policy is a major step toward operationalizing a new pathway to licensure for internationally trained physicians. Healthcare facilities in physician shortage areas will have the opportunity to expand their primary care and psychiatry practices, improving access to healthcare for patients in rural and underserved areas of Massachusetts.

Contact us

If you have questions regarding BORIM's guidance or the new licensing pathway outlined in the Mass Leads Act, please contact Crystal Bloom, Rebecca Rodman, or your Husch Blackwell attorney.