June 29, 2022

Background
As a condition of participating in Title IV, Higher Education Act, programs, institutions of higher education must disclose to enrolled and prospective students whether completion of a program “designed to meet educational requirements for a professional license” is sufficient to meet State licensure requirements (34 CFR Section 668.43(a)(5)). Under this federal regulation, a medical school must “make readily available” information regarding whether completion of its MD program “would be sufficient to meet licensure requirements” set by States.

Terminology
Medical school programs that award the MD degree are referred to as “undergraduate medical education” or “UME.” Graduate medical education (“GME”) consists of residencies and fellowships in which physicians are trained to practice independently in a particular area of medicine.

Liaison Committee on Medical Education
Since the Higher Education Act was enacted in 1965, the Liaison Committee on Medical Education (LCME®) — cosponsored by the American Medical Association and the AAMC (Association of American Medical Colleges) — has been recognized by the U.S. Department of Education as the reliable authority for the accreditation of UME programs leading to the MD degree (www2.ed.gov/admins/finaid/accred/accreditation_pg4.html#National_Institutional; 34 CFR Section 602.1(a)).

To be recognized by the U.S. Department of Education, an accrediting body must demonstrate it has sufficiently rigorous standards, including for evaluating the curricula of accredited programs (34 CFR Section 602.16(a)(1)(ii)). Through accreditation, the LCME provides assurance to medical students, graduates, the medical profession, health care institutions, licensing bodies, and the public that (1) accredited educational programs culminating in the award of the MD degree meet reasonable and appropriate national standards for educational quality and (2) graduates of such programs have a complete and valid educational experience sufficient to prepare them for the next stage of their professional training.

Graduation From LCME-Accredited MD Programs and State Physician Licensing Requirements
The AAMC undertook a legal review of State physician licensing requirements. The review found there is authoritative support in State statutes and regulations for medical schools offering LCME-accredited MD programs to determine that graduation from their schools with an MD degree satisfies the UME requirements set by medical licensing boards in all 50 States, American Samoa, the Commonwealth of Puerto Rico, the District of Columbia, Guam, the Virgin Islands, and the Commonwealth of the Northern Mariana Islands.

First, the AAMC review found that in all 50 States, American Samoa, the Commonwealth of Puerto Rico, the District of Columbia, Guam, the Virgin Islands, and the Commonwealth of the Northern Mariana Islands, there is express statutory or regulatory authority for MD graduates of LCME-accredited medical schools stating they satisfy the UME requirements of their physician licensing boards.

Second, the AAMC review found that all jurisdictions named above require licensed physicians with an MD degree to have passed all Step components of the United States Medical Licensing Examination (USMLE) sequence. Step 3 is the final examination in the USMLE sequence. Significantly, eligibility to take Step 3 includes having an MD degree from an LCME-accredited U.S. medical school (2022 USMLE Bulletin of Information, page 8; fsmb.org/siteassets/usmle-step3/pdfs/2022-usmle-bulletin.pdf).
In summary, according to the AAMC review of State physician licensing statutes and regulations, a physician who has graduated with an MD degree from an LCME-accredited medical school meets the UME requirements of physician licensing boards in all 50 States, American Samoa, the Commonwealth of Puerto Rico, the District of Columbia, Guam, the Virgin Islands, and the Commonwealth of the Northern Mariana Islands.

For these reasons, any LCME-accredited medical school may reasonably and reliably determine under 34 CFR 668.43(a)(5) that its MD degree graduates meet the UME requirements to sit for USMLE licensure exams and to qualify for licensure in all 50 States, American Samoa, the Commonwealth of Puerto Rico, the District of Columbia, Guam, the Virgin Islands, and the Commonwealth of the Northern Mariana Islands.

Because physician licensure requirements can change at any time and because some States may have additional requirements, such as those relating to GME, students are well-advised to contact the applicable State licensing board in any State in which they are seeking licensure.

Please direct any inquiries concerning this advisory to Frank R. Trinity, AAMC chief legal officer, legal@aamc.org.