

Bureau of Clinician Recruitment and Service

October 8, 2009

TO: National Health Service Corps (NHSC) Scholarship Program Recipients
(MD, DO, DDS and DMD) Eligible for Deferment of NHSC Service Obligations
for Postgraduate Training in 2010-11

SUBJECT: Requesting Deferment of Service for the 2010-11 Postgraduate Training Year

Under the Public Health Service Act Section 338C, physicians and dentists may request deferments to complete specialized training prior to the beginning of their service obligations.

Please review the attached **Deferment Information Bulletin** for Training Year 2010-11. The **Deferment Information Bulletin** describes the guidelines, conditions, and terms of deferment. The information in this **Bulletin** addresses issues for Year 2010 graduates of medical and dental schools, as well as physicians and dentists who are continuing residency training during the period July 1, 2010 through June 30, 2011.

Should you require assistance with or need explanations of the enclosed materials, please call the Scholar Support Branch at 301-594-4200 or 1-800-221-9393, 8:00 a.m. to 5:00 p.m. Eastern Standard Time, Monday through Friday.

Raymond F. Lala, DDS
Division of Scholar and Clinician Support

DEPARTMENT OF HEALTH AND HUMAN SERVICES

Health Resources and Services Administration
Bureau of Clinician Recruitment and Service

DEFERMENT INFORMATION BULLETIN

**DEFERRING THE SERVICE OBLIGATIONS
OF NATIONAL HEALTH SERVICE CORPS
SCHOLARSHIP PROGRAM PARTICIPANTS
FOR APPROVED POSTGRADUATE TRAINING**

For Year 2010 Graduates
of Schools of
Allopathic and Osteopathic Medicine
and Dentistry
and
For NHSC Scholars Continuing Approved Deferments
for the 2010-11 Training Year

National Health Service Corps
5600 Fishers Lane
Room 8-15
Rockville, Maryland 20857
Telephone: 1-800-221-9393
Fax: 301-451-5384

TABLE OF CONTENTS

<u>Contents</u>	<u>Page</u>
I. Program Authorities	2
II. Program Administration	2
III. Definitions	2-3
IV. Deferment Request Process	3-4
V. General Rules for Deferments.....	4-5
VI. Deferments for Physicians	5-8
VII. Deferments for Dentists	8
VIII. Licensure Examination.....	9
IX. Suspensions of the Service Obligation	9-10
X. Summary of Deadlines	10-11

PUBLIC BURDEN STATEMENT

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control number for this project is 0915-0179. Public reporting burden for the applicant for this collection of information is estimated to average 1 hour per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to HRSA Reports Clearance Officer, 5600 Fishers Lane, Room 14-33, Rockville, Maryland 20857.

This **Bulletin** is for National Health Service Corps (NHSC) Scholarship participants: (1) who are graduating in 2010 from schools of allopathic medicine (MD), osteopathic medicine (DO) and schools of dentistry (DDS and DMD) and (2) physicians and dentists who are continuing in approved postgraduate training programs and must confirm their training status for the 2010-2011 training year for deferments of service.

The **Bulletin** is based on the current Federal statutes, regulations, and administrative guidelines in effect for the NHSC Scholarship Program. It describes the terms and conditions for a deferment of your NHSC Scholarship Program service obligation to pursue approved postgraduate training (residency). In the event that any of this information changes, participants will be notified.

I. PROGRAM AUTHORITIES FOR DEFERMENTS

A. **Federal Statute:**

Section 338C of the Public Health Service Act
(Title 42 United States Code, Section 254m)

B. **Federal Regulation:**

Title 42 Code of Federal Regulations, Part 62, Subpart A,
"National Health Service Corps Scholarship Program"

II. PROGRAM ADMINISTRATION

Deferments of the service obligation under the NHSC Scholarship Program are administered by the Division of Scholar and Clinician Support (DSCS), Scholar Support Branch (SSB), 5600 Fishers Lane, Room 8-15, Rockville, Maryland 20857, Telephone number 1-800-221-9393, 8:00 a.m. to 5:00 p.m., Eastern Standard Time, Monday through Friday. The 24-hour fax number is 301-594-5384.

III. DEFINITIONS

A. **"Deferment"** - a delay in an NHSC Scholarship service obligation granted upon a scholar's request by the Director, DSCS, for a specified period of time to enter and complete approved postgraduate training, in accordance with the NHSC's Federal statute and regulations, and the administrative guidelines set forth in this Bulletin. Requests for deferment are reviewed annually, and are granted in 1-year increments.

B. **"DRF"** - an abbreviated term for the "Deferment Request Form."

C. **"Period of Time to Enter and Complete Approved Postgraduate Training"** - means the minimum period of approved postgraduate clinical training required for a physician and dentist to sit for a specialty board's certifying examination(s).

- D. "Postgraduate Training"** - means the postgraduate clinical training accredited by the Accreditation Council for Graduate Medical Education (MD programs), approved by the Board of Trustees of the American Osteopathic Association (DO programs), or approved by the Commission on Dental Accreditation of the American Dental Association (DDS and DMD programs).
- E. "Approved Postgraduate Training"** - means postgraduate training in a primary care program which has been approved by NHSC, consistent with the needs of the NHSC. See Sections VI and VII below.
- F. "Suspension of the Service Obligation"** - The Legal and Compliance Office (LCO) may grant a delay in the service obligation, in intervals of up to 1 year, for reasons other than for approved postgraduate training (e.g. illness, maternity, etc.). Requests for suspensions must be submitted in writing to the LCO with the required documentation. For more information, see Section IX of this Bulletin.

IV. DEFERMENT REQUEST PROCESS

To receive a deferment of the service obligation, a physician or dentist scholar **must annually request permission in writing** on a DRF to pursue approved postgraduate training, and the **DSCS must annually approve** the physician's or dentist's request.

During the last year of medical or dental school, DSCS will provide preliminary information to all physician and dental scholars. The information is designed: 1) to notify physician and dental scholars of the current programs of approved postgraduate training for purposes of their participation in the NHSC Scholarship Program and 2) to familiarize physician and dental scholars with the requirements for requesting and receiving approval of a deferment prior to the beginning of **each** training year.

NOTE: We encourage you to refer to the NHSC website for updated information. The website address is: <http://nhsc.hrsa.gov>. DSCS staff will post the deferment information on the Bureau of Clinician Recruitment Services (BCRS) website in the spring of each year.

In February of the final year of medical or dental school (and in February of each subsequent training year), DSCS staff will provide information to each physician and dental scholar. DSCS will provide you with DRF instructions for completing the form on line. To obtain a deferment to pursue approved postgraduate training, physicians and dentists **must promptly complete a DRF and return it to the DSCS by the deadline as set forth in the Deferment Information Bulletin (DIB)**. The timely submission of a completed DRF is necessary to give the DSCS sufficient time to evaluate the request and notify the physician or dentist of its approval or disapproval of the deferment request prior to the beginning of the new training year in July. **Should you fail to obtain a position in the postgraduate training that the NHSC has approved, you must notify the DSCS at once in writing.**

DSCS staff will provide the deferment information on Bureau of Clinician Recruitment Services (BCRS) website in October of each year. **It is your responsibility to immediately notify us in writing of any change in street or email address.** Failure to provide a completed DRF **yearly** can result in **considering you as being in default** of your scholarship obligation.

Please note that in certain circumstances, i.e., requesting to switch residency programs or to pursue a chief residency position, the DSCS also requires advanced written notice of the requested change and/or additional information in order for staff to make a timely decision concerning the deferment request. Please consult Section VI of this Bulletin for a description of the required letter and/or information. If further clarification is needed, contact the NHSC at 1-800-221-9393 prior to completion of the form.

V. GENERAL RULES FOR DEFERMENTS

The statute, 42 U.S.C. 254m (b)(5), provides that, deferments will be granted to complete postgraduate training **only** if the training is in a specialty specified as needed by the NHSC.

A. **Physicians**

If you are physician (MD or DO), you must complete a primary care residency training program listed in Section VI.A.2. **The NHSC will not pay for support (e.g., stipend, training expenses, certifying exams) while you are in postgraduate training.**

If a physician fails to enter approved postgraduate training, decides to enter unapproved postgraduate training, or fails to complete approved postgraduate training, he or she will be placed in default and be liable to pay liquidated damages equal to three times the amount of the scholarship plus interest.

B. **Dentists**

If you are graduating in 2010 as a dentist, you have an option to request a deferment to complete postgraduate training in one of the primary care dental specialties set forth below in Section VII.A.2. If you decide not to proceed with postgraduate training, you will begin service as a general dentist upon your graduation from dental school. **The NHSC will not pay for support (e.g., stipend, training expenses, board certifying exams) while you are in a dental residency program.**

C. **Postgraduate Training Incurring Service Obligations**

Deferments will **not be approved** by the DSCS for postgraduate training

conducted by any entity that imposes a service obligation, such as a branch of the Armed Forces of the United States.

D. The Terms and Conditions of Deferment:

1. Pursue only the training we have officially approved for your deferment.
2. Prior to each year of training, submit documentation to us of your training status in the approved program. (Submission of an annual Deferment Request Form meets this requirement.)
3. **Make no changes in your period or type of training without prior written approval from the DSCS.**
4. Notify the DSCS, in writing, **within 30 days** of any change of status, e.g., change of address or email address, intent to terminate training, intent to transfer to another residency program, or similar change.

E. Failure to Meet the Terms and Conditions of Deferment

1. Physicians

If you fail to comply with the terms and conditions of your deferment, you will be placed in default and be liable for liquidated damages equal to three times the amount of your scholarship award plus interest.

2. Dentists

If you fail to comply with the terms and conditions of your deferment, you will be placed as a general practice dentist. If you fail to accept your assignment, you will be placed in default and be liable for payment of the liquidated damages equal to three times the amount of your scholarship award(s) plus interest.

VI. DEFERMENTS FOR PHYSICIANS

A. Deferments

1. The Director, DSCS will grant deferments (in 1-year increments) for Physicians upon written request, for postgraduate (residency) training in specialty programs which are needed by the NHSC.
2. The Only Residencies Approved by the DSCS for Deferment are:
 - a. Family Practice 3 Years
 - b. General Internal Medicine 3 Years
 - c. General Pediatrics 3 Years

d.	Obstetrics-Gynecology	4 Years
e.	General Psychiatry	4 Years
f.	Internal Medicine/Family Practice	4 Years
g.	Internal Medicine/Pediatrics	4 Years

B. One-Year Osteopathic Internship Deferments

One-year osteopathic internships are approvable for deferments as some State Osteopathic Boards require a traditional rotating internship prior to entering a standard residency program. If you plan to pursue this internship year, please provide a letter from your training program stating that the internship is for one year and is prior to entering residency training. Upon completion of the one-year internship, osteopathic physicians are required to enter and complete a residency program in one of the approvable specialties listed above.

C. Dual Residency Programs

The NHSC's goal is to place well trained providers into underserved communities as soon as possible. Therefore, dual residency training programs listed in section A, above are the only dual residency programs that will be approved for the 2010-11 training year except as follows. Physicians who received a deferment to pursue a different dual residency program prior to the 2010-11 training year will continue to be eligible to receive deferments to complete that residency. However, a physician seeking to begin or switch to a dual residency program other than those specified above (IM/FP and IM/PED dual residency programs) for the 2010-11 training year will not be granted a deferment for that dual program.

D. Switching Residency Programs

If you are granted a deferment for 2010-11 and then during that year desire to switch to another postgraduate training program in the same or a different approvable specialty during the 2010-11 training year (See Section VI.A.2.), you must submit a new DRF and a letter from the new program director indicating your anticipated beginning and completion dates in the new residency program. The letter should also state how much credit will be given for prior residency training.

NOTE: The DSCS will not grant any additional time beyond the total of four (4) years from the start of your original program to complete residency training in a different program or specialty. DO NOT sign a contract with the new residency program before the DSCS approves the switch.

E. Osteopathic Physicians Switching to a Multi-Year Allopathic Residency ("Crossover")

If you are an osteopathic physician entering your first year of approved postgraduate training, and are granted a deferment for 2010-11, and then during that year desire a "crossover" residency in an allopathic program approved for

osteopaths for the 2011-2012 training year, you must submit with your upcoming DRF, a letter from the new program director indicating the anticipated beginning and completion dates in the new residency program. The letter should also include how much credit you would be given for prior residency training, thus, enabling you to be admitted at the PGY-2 level. If the credit is denied (documentation is required), a deferment will be granted for up to 1 additional year to complete the allopathic residency program.

**F. Deferring for Chief Residency Positions (2010-2011 Training Year)
Request to NHSC by February 26, 2010**

1. Should you be offered a one-year Chief Residency position by your training program, the Director, DSCS **may** grant the added deferment year **if** :
 - (1) a written request for the additional year of deferment is received by the NHSC on or before **February 26, 2010**; and (2) the request includes a copy of your program director's letter of invitation stating your anticipated start and completion dates, a description of the chief residency position and your responsibilities, and a brief description from you of how you plan to use the additional training in your NHSC career.
2. **The DSCS decision to release you from the NHSC's placement process will be based largely on the demand for your specialty that year.**
3. **Do not sign your Chief Residency contract before you have requested and received from the Director, DSCS written approval of your additional year's deferment.**
4. Any request received after the **February 26, 2010**, deadline will not be approved.

G. Deferment for Fellowships

The DSCS will approve, on a case-by case basis, consistent with the needs of the NHSC, requests submitted by clinicians in their last year of residency training, additional training in three specific fellowships:

- a. A one-year Child Psychiatry fellowship which may follow the completion of residency training in General Psychiatry;
- b. A one-year obstetrics/Gynecology Fellowship which may follow the completion of residency training in Family Practice; and
- c. A one (or two if all clinical, no research or administration training will be approved) year Geriatrics Fellowship which may follow the completion of residency training in Family Practice or General Internal Medicine.

Should you be offered a Fellowship by your training program, the Director, DSCS **may** grant the added deferment year **if**: a written request for the additional year of deferment is received by the DSCS on or before **February 26, 2010**; and (2) the request includes a copy of your program director letter of invitation stating your anticipated start and completion dates, a description of the fellowship and your responsibilities, and a brief description from you on how you plan to use the additional training in your NHSC career.

H. Ending Training to Begin Service

1. **Physicians must complete a residency training program in one of the approvable primary care specialties listed in Section VI.A.2.** If you do not complete your approved residency training, you will be in default of your scholarship obligation and be liable to pay damages equal to three times the amount of your scholarship plus interest.

VII. DEFERMENTS FOR DENTISTS

A. Deferments

1. The Director, DSCS will grant deferments (in one-year increments) for dentists upon written request, for postgraduate (residency) training in specialty programs which are needed by the NHSC.
2. The Only Dental Specialties Approved for Deferment are:
 - a. General Practice Dentistry 1 Year
 - b. Advanced Education General Dentistry Program 1 Year
 - c. General Pediatrics Dentistry 2 Years
 - d. Public Health Dentistry 2 Years

Deferment for Additional Training or Fellowships

The DSCS will approve, on a case-by case basis, consistent with the needs of the NHSC, requests submitted by clinicians in their last year of training, additional training in Geriatric Dentistry.

A one (or two if all clinical - no research or administration training will be approved) year deferment for Geriatric Dentistry Training may be approved.

B. Notice Deadlines: February 26, 2010 of Senior Year In Dental School

Notice of your intent to request a deferment must be received by the DSCS no later than **February 26 of your last year of dental school**. Any request received after the **February 26** deadline will not be approved. In addition, you must submit a DRF in the Spring by the stated deadline, giving complete information about the proposed program. If you do not request a deferment, you will become available to begin your service obligation, as a general practice dentist, upon your graduation from dental school.

VIII. LICENSURE EXAMINATION

A. Physicians

The NHSC requires all physicians to pass all three parts of the medical licensing examination (USMLE or COMLEX) prior to completing their last year of training, so that service can commence immediately upon completion of approved postgraduate training.

It is your responsibility to select a residency program that will adequately prepare you to sit for the USMLE or COMLEX and obtain the appropriate license to practice in the United States. You must notify the DSCS when you have successfully completed all three parts of the medical licensing examinations.

B. Dentists

A regional dental examination for the State in which you intend to practice should be taken and passed prior to completion of all dental residency programs, so that service can commence immediately upon completion of approved postgraduate training.

IX. SUSPENSIONS OF THE SERVICE OBLIGATION

Suspensions of the scholarship obligation may be granted for the reasons set forth below.

Requests for a suspension must be submitted in writing to the Bureau of Clinician Recruitment and Service, Division of Scholar and Clinician Support, 5600 Fishers Lane, Room 8-15, Rockville, Maryland 20857. The DSCS can be reached on 1-800-221-9393.

A. Suspensions for Medical and Personal Reasons

A suspension may be granted, for up to 1 year, if the scholarship participant provides independent medical documentation of a physical or mental health disability, or a terminal illness of an immediate family member, that results in the

participant's temporary inability to participate in the residency training. Upon receipt of a written recommendation for a suspension from DSCS, the BCRS Legal and Compliance Office (LCO) will mail instructions for documentation required to fully evaluate the request. The LCO will notify the scholar of the suspension

B. Failure to Pass Licensure Examination

Scholars who fail to pass the licensure examination **may** be granted a suspension, for up to 1 year, to retake the USMLE, COMLEX or a National Board of Dental Examiners examination and obtain results. In addition to a written request for a suspension, the participant must submit to the DSCS: 1) a copy of his/her examination results within 15 days of receipt; and 2) a letter from the residency program director verifying his/her standing in the training program. The scholarship participant is required to apply for and retake the examination at least twice during the suspension year. Failure to do so will cause the scholarship participant to be placed in default of his/her NHSC obligation. Further, the scholarship participant should take the necessary steps to maintain his/her knowledge and skills while waiting to pass the licensure examination.

C. Call to Active Duty in the Armed Forces

Scholar reservists who are called to active duty will be granted a suspension, for up to 1 year, beginning on the activation date described in the order. In addition to the written request for a suspension, a copy of the order to active duty must be submitted to the DSCS. The suspension will be extended if the applicable Armed Forces entity continues the period of active duty. A suspension request and a copy of the extension orders must be submitted to the DSCS. The period of active duty will not be credited toward the NHSC service obligation.

D. Maternity Suspensions

If the scholarship participant's maternity leave from the residency training program causes a change in the residency graduation date, the participant must request a suspension. The written suspension request, along with a treating clinician's statement confirming the projected delivery date, must be submitted to the DSCS. A suspension for maternity reasons is limited to 12 weeks if the residency program grants the leave.

X. SUMMARY OF DEFERMENT DEADLINE DATES (PLEASE MARK YOUR CALENDARS)

A. February 26 of Last Year of Dental School - Notice of Intent to Request Deferment for Postgraduate Dental Training.

1. February 26, 2010 Request for Chief Residency or Fellowship Starting in 2010.
2. February 26, 2010 Return of Deferment Request Form.

DEADLINE:

A. **Physicians**

Your DRF must be postmarked by February 26, 2010. If you do not submit your DRF by the deadline you can be subject to liquidated damages prescribed by Federal law.

B. **Dentists**

Dentists are not required to participate in postgraduate training. However, if you decide to pursue postgraduate training, notice of your intent to request a deferment should be received by the NHSC no later than February 26 of your last year of dental school or the deferment will not be approved. Additionally, your DRF must be postmarked by February 26, 2010. If you decide not to request postgraduate training, you will begin service as a general practice dentist upon your graduation from dental school. If you fail to accept your assignment, you will be placed in default and be liable for payment of the liquidated damages prescribed by Federal law.

PRIVACY ACT NOTIFICATION STATEMENT

This information is provided pursuant to the Privacy Act of 1974 (Public Law 94-579) of December 31, 1974, as amended, for individuals supplying information for inclusion in a system of records.