



## ***Occupational and Environmental Medicine: Clinical or Administrative Licenses – Which Is Correct for You?***

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This guidance statement is intended to help occupational and environmental medicine (OEM) physicians determine what type of medical license they should hold – a clinical or an administrative license. And what they should do if they are advised by their state licensing body to apply for an administrative license instead of a clinical license, and they disagree.

### ***Which License Is Right for Me?***

A clinical medical license allows an MD or DO to practice clinical medicine, examine, care for or/treat patients, prescribe medications including controlled substances, or delegate medical acts or prescriptive authority to others. The Accreditation Council for Graduate Medical Education (ACGME) defines the clinical practice of medicine as: “The practice of medicine in which physicians assess patients (in person or virtually) or populations in order to diagnose, treat, and/or prevent disease using their expert judgment. It also refers to physicians who contribute to the care of patients by providing decision support and information systems, laboratory, imaging, or related studies.”<sup>1</sup> OEM physicians understand how to recognize, prevent, evaluate, diagnose, treat, and manage adverse health effects from workplace and environmental hazards, as well as how to create and promote a culture of wellness in the workplace. The clinical practice of OEM meets ACGME’s definition because it includes not only direct patient care, but also caring for populations of workers and decision support to maximize the health and safety of workers.

OEM physicians manage employee absences, evaluate work capacity, prevent work disability, and assess fitness-for-work duties based on knowledge of the workplace environments, occupations, and job tasks. They also advise on appropriate work restrictions, disaster preparedness, surveillance and design and implement programs focused on employee health and human performance. Across the country, OEM physicians advise medical centers, hospitals, meat-packing facilities, transportation companies, and multiple other employers on implementing proper methods on how to: 1) protect their workers; 2) determine when to remove them from the workplace; and 3) safely return them to work and keep them at work. The COVID-19 pandemic has only highlighted the import role of OEM physicians.

OEM physicians have specialized training in epidemiology and public health, including the issues that pertain to testing protocols needed for communicable diseases and contact tracing. These skills and responsibilities embody the practice of clinical medicine.

An administrative medical license on the other hand, while allowing a physician to use his/her medical and clinical knowledge, skill, and judgment in non-clinical advisory or administrative activities related to the practice of medicine or to the delivery of health care services, does not include the authority to examine, care for or treat a patient, delegate medical acts to other health care providers, prescribe drugs or controlled substances, or conduct clinical trials on humans.<sup>2</sup>

***What Should I Do if My State Licensing Board Advises Me to Apply for an Administrative License Because I am an OEM Physician?***

According to the Federation of State Medical Boards (FSMB), there are currently 19 states that issue administrative licenses.<sup>3</sup> While most licensing decisions appear to be the choice of the physician applicant, some states can make the determination on their own. To date, there are a few state-licensing boards that only allow OEM physicians to obtain an administrative medical license, precluding them from obtaining a full license. In such a situation, the licensing board clearly does not understand the role or depth of practice of the OEM physician, as there are other physicians such as clinical informatics physicians, pathologists, and radiologists who may not provide direct patient care, but who are considered practitioners of clinical medicine.

If you agree that your practice falls under the area of administrative practice and this limited license is appropriate in your case, that is your decision. But if you disagree, you need to provide your licensing board with documentation (including this statement) to show the board that OEM is, as the American Medical Association (AMA) notes, the most wide-ranging of all medical specialties and defines it as the specialty, “devoted to the prevention and management of occupational and environmental injury, illness and disability, and promotion of health and productivity of workers, their families and communities.”<sup>4</sup> ACOEM believes that this definition clearly defines the clinical practice of medicine and does not require hands-on individual patient care.

Documentation in support of full clinical licensure includes the AMA statement above, the ACOEM OEM Core Competencies,<sup>5</sup> the ACOEM guidance statement on the role of the corporate medical director,<sup>6</sup> and if certified by the American Board of Preventive Medicine (ABPM), information from that body.<sup>7</sup>

***What Should State Medical Boards Know About OEM When Issuing Medical Licenses?***

Medical licensing bodies should consider care for a population as medical practice, not administrative. Health improvement requires great effort at a systems level, with populations, not just individual patients, as the end target of health. It is important for physicians to be involved at all levels and participation of physicians, such as preventive medicine specialists (which includes occupational and environmental medicine), in any of these levels of care must be considered performing medical practice.

OEM physicians can become board certified in occupational medicine through the American Board of Preventive Medicine (ABPM). ABPM states that the specialty of occupational medicine focuses on the health of workers, including their ability to perform work, and the physical, chemical, biological, and social environments of the workplace.<sup>7</sup> The American Board of Medical Specialties (ABMS) also states that “a specialist in Preventive Medicine focuses on the health of individuals and defined populations in order to protect, promote and maintain health and well-being, and to prevent disease, disability and premature death. They may be a specialist in Aerospace Medicine, Occupational Medicine, or Public Health and General Preventive Medicine.”

***ACOEM’s Position***

OEM focuses on the interaction between work, the environment, and health. Physicians practicing OEM are expected to understand how to recognize, prevent, evaluate, diagnose, treat, and manage adverse health effects from workplace and environmental hazards.<sup>5</sup> Thus, it is the position of ACOEM that OEM physicians do practice clinical medicine and therefore qualify for a full unrestricted medical license.

## References

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## Additional Resources

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