

Policy for Failure to Timely Submit Renewal

Policy Number:	OSBOE-P009
Adopted by Board:	September 18, 2025
To be Reviewed:	2028

Purpose:

This policy defines the requirements to submit a renewal following license expiration and prior to cancellation at the September Board Meeting.

Relevant Citations:

59 O.S. § 641 A.

All persons legally licensed to practice osteopathic medicine in this state, on or before the first day of July of each year, shall apply to the State Board of Osteopathic Examiners, on forms furnished thereby, for a renewal certificate of registration entitling such licensee to practice osteopathic medicine and surgery in Oklahoma during the next ensuing fiscal year.

59 O.S. § 641 C.

- 1. Each application shall be accompanied by a renewal fee in an amount sufficient to cover the cost and expense incurred by the State Board of Osteopathic Examiners, for a renewal of the person's certificate to practice osteopathic medicine.
- 2. The Board may provide for the **late renewal of a license upon payment of a late fee** in accordance with Board rules.

59 O.S. § 641 D.

- 1. In addition to the payment of the annual renewal fee, each licensee applying for a renewal of the certificate shall furnish to the State Board of Osteopathic Examiners proof that the person has attended at least two (2) days of the annual educational program conducted by the Oklahoma Osteopathic Association, or its equivalent, as determined by the Board, in the fiscal year preceding the application for a renewal; provided, the Board may excuse the failure of the licensee to attend the educational program in the case of illness or other unavoidable casualty rendering it impossible for the licensee to have attended the educational program or its equivalent.
- 2. The Board shall require that the licensee receive not less than one (1) hour of education in pain management or one (1) hour of education in opioid use or addiction each year preceding an application for renewal of a license, unless the licensee has demonstrated to the satisfaction of the Board that the licensee does not currently hold a valid federal Drug Enforcement Administration registration number. Such

education may be held at the annual educational program referenced in paragraph 1 of this subsection.

59 O.S. § 622 A.

1. Except as otherwise provided by this section, it shall be unlawful for any person to practice as an osteopathic physician and surgeon in this state, without a license to do so, issued by the State Board of Osteopathic Examiners; provided, that any license or certificate issued under the laws of this state, authorizing its holder to practice osteopathic medicine, shall remain in full force and effect. Persons who hold themselves out as osteopathic physicians in this state without a license issued by the State Board of Osteopathic Examiners shall submit themselves to the jurisdiction of the State Board of Osteopathic Examiners.

59 O.S. § 637.1 C.

The Secretary of the Board may issue a **letter of concern to a licensee**, **without a hearing**, when evidence does not warrant formal proceedings, but indications exist of possible errant conduct that **could lead to serious consequences and formal action**. The letter of concern may contain, at the Secretary's discretion, clarifying information from the licensee. Such letters of concern are considered remedial.

Procedure:

All physicians with a Lapsed license submitting a late renewal shall follow the steps outlined below.

- 1. If the renewal is not submitted by the deadline, Physician must cease practice in Oklahoma until the license has been reinstated.
- 2. Physician shall ensure all annual Continuing Medical Education (CME) requirements have been uploaded to CE Broker, including relevant exemptions;
- 3. Physician shall complete and submit a renewal application located in their Licensee Dashboard on the Boards licensure software;
- 4. Following submittal, the renewal will be reviewed by Board staff to ensure accuracy and then an Attestation stating the physician has not practiced since their license Lapsed will be emailed to the physician's email of record. This attestation will need to be reviewed, signed and returned by the physician; and
- 5. Once all information has been reviewed and Attestation has been received, the renewal may then be processed.

Approval of the renewal is not guaranteed; each application is reviewed on a case-by-case basis.

If the physician is unable to sign the above-mentioned Attestation or is unable to produce the statutorily required CME, Board staff may offer the physician a settlement that could include a Private Letter of Concern and a fine of up to \$100 per calendar day of practice without a license or failure to complete CME. The physician may also choose to appear before the Board to discuss their non-compliance at the next regularly scheduled meeting in lieu of settlement.