

POMA



PENNSYLVANIA  
OSTEOPATHIC  
MEDICAL  
ASSOCIATION

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*A divisional society of the American  
Osteopathic Association*

Original: 2382

April 4, 2005

John R. McGinley, Jr., Chairman  
Independent Regulatory Review Commission  
14th Floor, Harrisstown 2  
333 Market Street  
Harrisburg, PA 17101

Dear Chairman McGinley:

The Pennsylvania Osteopathic Medical Association supports the draft revisions to regulations of the State Board of Osteopathic Medicine concerning continuing medical education (CME) (Title 49, Subpart A, Chapter 25, Subchapter A. General Provisions).

While we have been mandated to provide continuing medical education credits to the osteopathic profession as a requirement for the past six licensure cycles (12 years), we believe Category 1A CME credits are essential so that physicians continue to receive face-to-face education on the osteopathic philosophy. The 20 Category 1A CME credits have not been a burden in the past to osteopathic physicians, as we provide the following:

- The Annual POMA Clinical Assembly offers a yearly minimum of 35 Category 1A CME credit hours;
- The Pennsylvania Osteopathic Family Physicians Society offers a yearly minimum of 20 Category 1A CME credit hours;
- POMA District 8, which encompasses 12 counties in Southwestern Pennsylvania, offers a winter conference worth 25+ Category 1A CME credit hours each year;
- POMA Districts 7&9 in Shenango Valley offer a Western Refresher Course for 8+ hours Category 1A CME credit each year;
- POMA District 4 in Northeastern Pennsylvania holds a seminar worth 7+ hours Category 1A CME credit each year;
- POMA District 6 in Central Pennsylvania holds a yearly seminar worth 8 hours Category 1A CME credit;
- POMA District 3 in the Lehigh Valley area holds a weekend seminar worth 12+ hours Category 1A CME credit each year;
- POMA District 9 in Northwestern Pennsylvania holds a yearly weekend conference worth 20+ Category 1A CME credit;
- The Philadelphia College of Osteopathic Medicine offers weekly courses worth Category 1A CME credit;

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REVIEW COMMISSION

- The Lake Erie College of Osteopathic Medicine holds a yearly seminar with 20 hours Category 1A CME credit;
- Each of POMA's 13 districts hold three to 12 meetings per year offering Category 1A CME credit;
- The American Osteopathic Association holds a yearly convention providing 25+ Category 1A CME credits. This convention also includes several specialty and subspecialty lectures;
- The American College of Osteopathic Internists holds two national conventions each year with each offering 25+ Category 1A CME credits;
- The American College of Osteopathic Surgeons, which includes all surgical specialties and subspecialties, including orthopedics, critical care, vascular, plastic and reconstructive, etc., offers two seminars each year worth 25+ Category 1A CME credits;
- The American Osteopathic College of Anesthesiologists holds two national conventions each year with each offering 25+ Category 1A CME credits; and
- Other specialty colleges also hold seminars on a yearly basis, awarding Category 1A CME credits.
- Several hospitals/institutions offer AOA Category 1A CME credits with POMA as a co-sponsor.

Therefore, we believe that Category 1A CME credits are available for everyone. And the 20 credits are a *minimum*.

Whether an osteopathic physician is a family physician, a specialist or a subspecialist, the 20 Category 1A CME credits are important to enhance the continuance of the osteopathic practice and principles these physicians studied to obtain their D.O. degree, and which they use in their practice.

The POMA is an AOA-accredited CME sponsor and works closely with entities wanting to offer CME credits to osteopathic physicians.

The POMA appreciates the opportunity to express our comments and support the revisions to the State Board of Osteopathic Medicine regulations.

Sincerely,



Les T. Pallone, D.O.  
President

cc: Honorable Robert M. Tomlinson, Chair, Senate Consumer Protection and Professional Licensure Committee  
Honorable Thomas Gannon, Chair, House Professional Licensure Committee  
William W. Lander, M.D., President, Pennsylvania Medical Society  
Roger F. Mecum, Executive Vice President, Pennsylvania Medical Society



# Pennsylvania MEDICAL SOCIETY®

Original: 2382

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ROGER F. McCUM  
*Executive Vice President*

March 29, 2005

John R. McGinley, Jr.  
Chairman  
Independent Regulatory Review Commission  
14<sup>th</sup> Floor, Harrisstown 2  
333 Market St.  
Harrisburg, PA 17101.

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 2005 MAR 29 PM 2:54  
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 REVIEW COMMISSION

Dear Chairman McGinley:

The Pennsylvania Medical Society provides the following comments on the draft revisions to regulations of the State Board of Osteopathic Medicine concerning continuing medical education (Title 49, Subpart A, Chapter 25, Subchapter A. General Provisions).

We noted an inconsistency in the regulatory language as drafted that requires clarification. At (1), the language states, "...at least 20 hours shall be completed in AOA category 1A approved activities." As specified in the definitions, "approved activities" includes activities accepted for AOA, ACCME, or AMA PRA credit but does not specify that they be Category 1 activities. The problem could be fixed by replacing "approved activities" with or other Category 1 activities. This change would clarify that activities defined as "approved activities" are acceptable but would specify that these twenty hours must be Category 1 activities. The change will allow osteopathic physicians to comply with the twenty hour Category 1 requirement using either AOA Category 1A or 1B activities or the more readily available ACCME/AMA Category 1 activities, especially in some medical and surgical specialties. If the Osteopathic Board wishes to confine licensees to 1A credit if they use osteopathic programs to satisfy the requirement for the twenty hours of Category 1 education, then the Board could simply move the listing of AOA Category 1B credit to the definition of Category 2 activities.

If the regulations were revised to include other Category 1 activities, the Medical Society would strongly support adoption. However, the Society would not support restricting osteopathic physicians to using only AOA credits to satisfy the twenty hours of required Category 1 hours. As previously stated, AOA credits are not as available as ACCME/AMA credits. We fear that requiring osteopathic physicians to obtain some portion of their continuing medical education that can only be satisfied with AOA credits will force some physician specialists to take programs irrelevant to their practice simply because they bear AOA credit.

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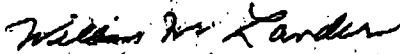
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The Pennsylvania Medical Society appreciates the opportunity to submit its comments concerning these proposed regulations.

Sincerely,



William W. Lander, MD  
President

Cc: Honorable Robert M. Tomlinson, Chair, Senate Consumer Protection and Professional Licensure  
Committee  
Honorable Thomas Gannon, Chair, House Professional Licensure Committee  
Mario E. J. Lanni, Pennsylvania Osteopathic Medical Association



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**Comments:**

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