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February 19, 2004

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Amy L. Nelson
Counsel
State Board of Osteopathic Medicine
P.O. Box 2649
Harrisburg, PA 17105-2649

Dear Ms. Nelson:

We reviewed the recently published proposed regulations on continuing medical education amending 49 PA Code Chapter 25.

Although we have no disagreement with the proposed regulations, we did notice two technical errors in 25.271 (c)(1). The third sentence in that paragraph notes that the remainder of courses to satisfy the total 100 hour requirement can be in any approved course.

First the sentence states that the remaining seventy-five hours can be in other courses. Adding that number to the twenty hours of Category I and ten hours of patient safety, one would be requiring 105 hours. The number in this sentence should be seventy.

The second technical problem is with the statement that the remainder in approved courses defined as those sponsored by organizations accredited by the AOA or ACCME. However, these bodies do not accredit sponsors of Category II continuing medical education. In addition, much Category II continuing medical education is self-directed and has no sponsor per se. Perhaps just removal of "approved" and substitution of "medical educational activities" would suffice to correct the problem without allowing credit for programs unrelated to a physician's practice.

Sincerely,

Jitendra M. Desai, MD
President

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Cc: The Honorable Robert Tomlinson, Chair, Consumer Protection and Professional Licensure Committee
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