

Stephen Hoffman

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From: Michael McCollum <drmmccollumdo@gmail.com>
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To: RA-STRegulatoryCounsel@pa.gov
Cc: IRRC
Subject: Osteopathic medical board fee increase, ATTN: Regulatory Counsel

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Independent Regulatory
Review Commission

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To whom it may concern in the PA State regulatory counsel and the PA IRRC:

I am writing regarding the open comment period for the proposed increase in fees for Osteopathic Medicine Licenses in the State of Pennsylvania. This specifically relates to Regulation #16A-5334: Fees.

I am a licensed osteopathic physician in the state of PA and have been so since December of 2012. I recently became aware of the board's proposal to more than double licensing fees over the next 3 renewal cycles, related to the vague statement of a "budget deficit".

To note, I only received notification through a state medical society that follows board actions, not the board itself. The lack of notification to the licensed physicians this would effect in proposing this increase seems unprofessional at best, and duplicitous at worst. Also, the timing of the request is poor: while clearly in an attempt to hurry the increase by the 2020 renewal cycle, this is during a pandemic where most physicians are preoccupied with other issues and would for the most part miss the comment period. Therefore, most of the license holders would not have a say and would just have to "pay up" once this is quietly passed.

Obviously, as one can conclude, I am against any increase in licensing fees (seeing as we get little to no service from them); but especially so when the margin of increase desired more than doubles the current fee in a short 6 year time span. The state already has difficulty attracting physicians due to a poor medical malpractice situation, and adding more fees will do nothing to help bring in capable physicians.

As to the this issue, I have relevant questions:

Why is there a deficit and what has been overspent that every license holder would have such a significant increase to do so?

Has there been consideration in joining Boards, much as many other states have-PA is one of only a handful of states with a separate osteopathic board and a conjoined board would be simpler, easier for licensing and decrease fees for both the MD and DOs in state (not to mention making CME requirements equal for both groups)?

Thank for your attention to my comments regarding this matter.

Regards,
M. McCollum, DO