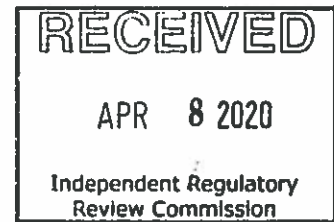


**Worthington, Amber**

**From:** ST, RegulatoryCounsel  
**Sent:** Tuesday, April 7, 2020 9:04 AM  
**To:** Suter, Kenneth J (OLC); Worthington, Amber  
**Subject:** FW: [External] ATTN: Regulatory Counsel



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**From:** Dhimitri Nikolla <Dhimitri.Nikolla@med.lecom.edu>  
**Sent:** Saturday, April 4, 2020 10:20 AM  
**To:** ST, RegulatoryCounsel <RA-STRegulatoryCounsel@pa.gov>  
**Subject:** [External] ATTN: Regulatory Counsel

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Re: State Board of Osteopathic Medicine Proposed Regulations to Raise Application and Licensure Fees

Dear PA State Board of Osteopathic Medicine,

In this post-single accreditation era, osteopathic students, residents, and physicians are financially disadvantaged compared to our MD colleagues.

- Osteopathic students are compelled to pay and take two sets of board exams (COMLEX and USMLE).
- Osteopathic residents in our state who train at an ACGME residency (now all residencies) must, in most cases, pay for the osteopathic training required to fulfill the recognition of their PGY-1 year by the AOA.
- Osteopathic physicians in the our state are still required to obtain AOA 1A credits for licensure, which in my specialty of emergency medicine, the American Osteopathic Board of Emergency Medicine no longer requires.

Increasing licensure fees are expected, but the continued need for osteopathic physicians to find, pay, and travel for infrequent and limited AOA 1A credits is an unfair burden to osteopathic physicians in our state. These credits are even more limited during our current COVID-19 pandemic given conference cancellations. I would encourage the board to remove this unfair AOA 1A credit burden on Pennsylvania osteopathic physicians.

Best,

Dhimitri Nikolla, DO

Emergency Physician

AHN SVH/WMH

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