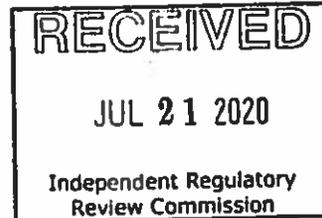




July 16, 2020

Kenneth J. Suter, Esq.  
Counsel  
State Board of Podiatry  
2601 N. Third Street  
P.O. Box 69523  
Harrisburg, PA. 17106-9523



Dear Mr. Suter,

On behalf of the American Podiatric Medical Association (APMA) and at the request of Pennsylvania Podiatric Medical Association (PPMA) and Pennsylvania podiatrists, I write to address several concerns with the proposed changes to the State Board of Podiatry's continuing education rules for licensed doctors of podiatric medicine. APMA is the premier professional organization representing a vast majority of the estimated 15,000 podiatrists in the United States. Within APMA's umbrella of organizations are 53 component societies in states, including Pennsylvania, and other jurisdictions, as well as over 10 affiliated and related organizations.

APMA concurs with PPMA's comments on opposing the reduction of continuing education credit hours (CECH) from 50 CECH every two years to 45 CECH every two years. In its letter to the Board of Podiatry, PPMA provided the historical context and background on how 50 CECH was initially established, and it is our understanding that the increase in hours was done to more closely align with allopathic medicine. The profession has a proud history of obtaining parity with its allopathic and osteopathic colleagues, and this is in large part because the profession has been successful in demonstrating that education, training, and experience of podiatric physicians and surgeons is similar to that of allopathic and osteopathic physicians. The primary difference is that podiatric medical education focuses on the specialty area much earlier and in greater depth compared to allopathic and osteopathic education. In order to continue to maintain parity, APMA agrees with PPMA that the CECH hours should not be reduced to 45 hours every two years.

APMA also recommends that the Board of Podiatry regulations more closely align with the Council on Podiatric Medical Education (CPME) guidance on the issue of independent journal reading. "CPME 720: Standards and Requirements for Approval of Providers of Continuing Education in Podiatric Medicine" does not permit granting of CECH "for unsupervised study or

assigned reading.”<sup>1</sup> However, CPME 720 does allow for continuing education to utilize instructional materials including, but not limited to journals.<sup>2</sup> Current Board of Podiatry rules are consistent with CPME 720 and APMA recommends no change to Sec.29.61 (a)(3).

APMA welcomes any further discussion on this matter and would be more than happy to have a dialogue with the PA State Board of Podiatry or yourself, if any questions about our comments should arise. Please contact Chad Appel, JD, Director of APMA’s Center for Professional Advocacy, at 301-581-9234 or via e-mail at [clappel@apma.org](mailto:clappel@apma.org).

Sincerely,



Seth Rubenstein, DPM  
President

C: Sabrina Minhas, DPM, President, Pennsylvania Podiatric Medical Association

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<sup>1</sup> Council in Podiatric Medical Education, “CPME 720, “Standards and Requirements for Approval of Providers of Continuing Education in Podiatric Medicine,” Appendix A  
<https://www.cpme.org/education/content.cfm?ItemNumber=2440&navItemNumber=2249> (October 2019).

<sup>2</sup> *Id at p. 29.*