

Archived: Wednesday, June 5, 2024 11:24:27 AM

From: [BPL-BoardSupport](#)

Sent: Tue, 4 Jun 2024 14:21:16

To: [MacIntosh, Weston \(LARA\)](#)

Subject: FW: Public Comment on Rule Set 2023-36 LR

Importance: Normal

Sensitivity: None

Attachments:

[AAFP MAFP Mich Board of Osteopathic Medicine and Surgery Letter on CME Requirements 2024.pdf](#) 

From: Emily Henderson <emily@mccallhamilton.com>

Sent: Tuesday, June 4, 2024 8:36 AM

To: BPL-BoardSupport <BPL-BoardSupport@michigan.gov>

Cc: Karlene Ketola <kketola@mafpa.com>; Grant Meade <gmeade@mafpa.com>

Subject: Public Comment on Rule Set 2023-36 LR

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Good morning,

Attached, please find written public comments that I am submitting on behalf of the American Academy of Family Physicians and the Michigan Academy of Family Physicians for the Administrative Rules for Osteopathic Medicine and Surgery (Rule Set 2023-36 LR). These comments accompany verbal comments that will be given at the public hearing on June 4 at 9:00 a.m.

Should there be any questions, please do not hesitate to reach out.

Best,

Emily Henderson



Emily M. Henderson
Government Affairs Consultant

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Strong Legacy. Bold Future.



February 2, 2024

Michigan Board of Osteopathic Medicine and Surgery
c/o Bureau of Professional Licensing
Board and Committees Section
P.O. Box 30670
Lansing, Michigan 48909-8170
Email: BPL-BoardSupport@michigan.gov

To Whom It May Concern:

Re: Acceptance of AAFP credit towards CME requirements for re-licensure

The American Academy of Family Physicians (AAFP) and Michigan Academy of Family Physicians (MAFP) are aware that the Michigan Board of Osteopathic Medicine and Surgery is requiring all continuing medical education (CME) activities to be offered by an American Osteopathic Association (AOA) or Accreditation Council for Continuing Medical Education (ACCME) accredited provider, meaning all activities must have AOA or American Medical Association (AMA) Category 1 Credit™. This represents an abrupt change in practice to roughly 2,700 family physicians in Michigan that have historically used AAFP Prescribed credit to remain licensed.

An interpretation of CME oversight that considers only the AOA and ACCME accreditation systems does a disservice to all parties involved. It is the CME credit systems of the AAFP, the AMA and the AOA that award credit to activities and, of these, only the AAFP reviews the details of each individual CME activity. By reinstating your acceptance of CME activities provided by CME provider organizations that secure credit from the AAFP, you will:

- Expand the acceptance of thousands of important educational activities beyond those offered by AOA and ACCME-accredited providers for family physicians (allopathic and osteopathic) and other primary care professionals,
- Ensure family physicians can engage in CME that is relevant to their scope of practice,
- Reduce burden for 2,700 family physicians, and,
- Ensure that over 1,000 deserving CME provider organizations, including the Michigan Academy of Family Physicians, benefit from your reinforcement of the legitimacy of their educational activities for physicians.

Importantly, all the CME credit systems regularly collaborate to harmonize requirements and require all parties to adhere to the ACCME Standards for Integrity and Independence in Accredited Continuing Education.

STRONG MEDICINE FOR AMERICA

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Executive Vice President
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Leawood, KS

AAFP offers the following proposed revisions to [Public Act 368 of 1978, as amended. LARA-LOS-700 \(4/19\)](#):

Requirement for Relicensure:

Category 1.B.

Maximum: 110 hours - Attendance at or participating in a continuing education program or activity related to the practice of osteopathic medicine which includes, but is not limited to, live, in-person programs; and journal articles with a self-study component, interactive or monitored teleconference; audio conference; web-based programs; or online programs approved or offered by any of the following:

- Accreditation Council for Continuing Medical Education
- **American Academy of Family Physicians**
- American Medical Association
- **American Osteopathic Association**
- Michigan State Medical Society
- Letter or certificate of completion

The AAFP and MAFP recommend that the Michigan Board of Osteopathic Medicine and Surgery reinstate the practice of CME credit/accreditation from all four U.S. institutions listed below that have oversight of CME. The organizations, presented in order of their dates of origin, include:

1. The AAFP has certified individual CME activities since 1948.

AAFP CME credit focuses on a review of CME at the activity level. The AAFP Credit System's review ensures the relevance of content to a family physician audience and validates an activity's scientific integrity and soundness.

2. The AMA established its Physician Recognition Award (PRA) Category 1™ Credit in 1968.

The AMA PRA Credit System defines the standards and policies for the PRA. Within the United States, only organizations accredited by either the ACCME or a recognized state medical society may certify activities for AMA PRA Category 1 Credit™.

3. The AOA has accredited CME providers and individual CME activities since 1973.

The AOA has its own system and standards for designating AOA CME credit. The AOA Board of Trustees establishes the AOA's credit system policies and procedures which are monitored by the AOA Council on Continuing Medical Education.

4. The ACCME has accredited CME providers since 1981.

The ACCME accredits organizations directly and recognizes state medical societies which in turn accredit organizations within their state or region. Once accredited, these organizations are granted the privilege of designating AMA PRA Category 1 Credit™ to their CME activities.

Re: Acceptance of AAFP credit towards CME requirements for re-licensure

The AAFP and MAP strongly encourage the Michigan Board of Osteopathic Medicine and Surgery to implement this change. Michigan licensees must be allowed to report AAFP credit towards their re-licensure requirements. We welcome the opportunity to speak with you about this important issue. Please contact Amy Smith, MBA, Director of CPD Accreditation, at amys@aafp.org or 913-906-6057 with any questions or concerns.

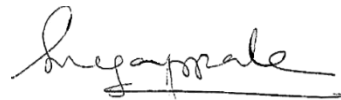
Thank you for your consideration.

Sincerely,



Handwritten signature of Tochi Iroku-Malize in cursive script, with the text "MD, MPH, MBA" written below it.

Tochi Iroku-Malize, MD, MPH, MBA, FAAFP, Board Chair
American Academy of Family Physicians



Handwritten signature of Beena Nagappala in cursive script, with a horizontal line underneath the signature.

Beena Nagappala, MD, MPH, FAAFP, President
Michigan Academy of Family Physicians