



November 14, 2022

Senator Jon Bumstead, Chair  
Representative Luke Meerman, Alternate Chair  
Members of the Joint Committee on Administrative Rules  
Boji Tower, 3rd Floor  
124 W. Allegan Street  
PO Box 30036  
Lansing, MI 48909

***Sent electronically***

**RE: Administrative Rules Waiver Request**

Dear Senator Bumstead, Representative Meerman, and Committee Members:

The Michigan State Medical Society (MSMS) respectfully requests the Joint Committee on Administrative Rules (JCAR) waive the remaining session days, under the authority provided in the Administrative Procedures Act, MCL 24.245a(1) for the Public Health Code General Rules (Rule Set 2022-17 LR).

MSMS is supportive of the efforts by the state of Michigan to raise awareness about the impact of implicit bias on patient-health professional interactions, treatment decisions, treatment adherence, and patient health outcomes. The revisions allow easier access to high-quality programming for all 400,000 health care professionals while not diluting the original intent for training. The changes will also better align the precedented processes for new compulsory topics for licensure.

For these reasons, MSMS urges JCAR to waive the remaining session days to allow for immediate effect. Should you have any questions regarding our recommendation, MSMS would be happy to discuss further. The MSMS point of contact is Rebecca J. Blake, Senior Director of Subsidiaries, Education and Foundation. She can be reached at [rblake@msms.org](mailto:rblake@msms.org) or 517.336.5729. Your consideration is greatly appreciated.

Sincerely,

*Mark C. Komorowski, MD*

Mark C. Komorowski, MD  
Chair, MSMS Board of Directors