



January 15, 2018

The Honorable Lizbeth Benacquisto  
Florida State Senate  
400 Senate Office Building  
404 South Monroe Street  
Tallahassee, FL 32399-1100

Dear Senator Benacquisto:

**The American Osteopathic Association (AOA) and the Florida Osteopathic Medical Association (FOMA) are writing to request an amendment to Senate Bill 8.** This bill relates to controlled substance prescribing and pain management clinic ownership and operation. It currently recognizes physicians who are board certified in pain medicine by the American Board of Medical Specialties and the AOA, but fails to include the equivalent AOA certification in pain management for osteopathic anesthesiologists. Florida state law recognizes osteopathic (DO) and allopathic (MD) physicians as equal, and the AOA and FOMA respectfully request that the bill be amended to reflect all appropriate pain-related certifications offered by the AOA.<sup>1</sup>

The AOA represents nearly 140,000 osteopathic physicians (DOs) and osteopathic medical students, promotes public health, encourages scientific research, serves as the primary certifying body for DOs and is the accrediting agency for osteopathic medical schools. More information on DOs/osteopathic medicine can be found at [www.osteopathic.org](http://www.osteopathic.org). FOMA is a professional medical organization that represents nearly 8,000 DOs providing patient care in Florida.

The AOA currently offers a subspecialty certification in pain medicine for board certified DOs practicing in a number of specialties, as well as a subspecialty certification in pain management for board certified osteopathic anesthesiologists. The AOA recognizes both as equivalent for purposes of controlled substance prescribing and pain clinic ownership and operation. **Therefore, the AOA and FOMA respectfully request the following amendments:**

§ 456.44 (3)(g), Line 289 “board certified in pain medicine **or pain management** by the American Board of Pain”

§ 458.3265 (3)(h), Line 383 “certified in pain medicine **or pain management** by the American Board of Pain”

§ 459.0137 (3)(h), Line 515 “medicine **or pain management** by the American Board of Pain Medicine or a board”

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<sup>1</sup> Fla. Stat. §459.011(4)(b); Fla. Stat. §459.011(4)(c); Fla. Stat. §459.011(4)(d).

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**The AOA and FOMA appreciate your consideration of our request to amend Senate Bill 8.**

Should you need any additional information, please feel free to contact Raine Richards, JD, Director, State Government Affairs at [rrichards@osteopathic.org](mailto:rrichards@osteopathic.org) or (800) 621-1773, ext. 8199.

Sincerely,



Mark A. Baker, DO

President, AOA

Ronald Renuart, DO, FACFP

President, FOMA

CC: William S. Mayo, DO, President-elect, AOA  
Joseph M. Yasso, Jr., DO, Chair, Department of Governmental Affairs, AOA  
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