



**MICHIGAN  
OSTEOPATHIC  
ASSOCIATION**

May 24, 2017

The Honorable Hank Vaupel  
Chairman  
Michigan State House Health Policy Committee  
N-896 House Office Building  
P.O. Box 30014  
Lansing, Michigan 48909

Dear Chairman Vaupel:

**The American Osteopathic Association (AOA) and the Michigan Osteopathic Association (MOA) are writing to request amendments to HB 4404.** This bill relates to licensure of Pain Management Facilities. It requires a physician with an ownership interest in a Pain Management Facility to hold a pain-related subspecialty board certification from either the American Board of Medical Specialties or the AOA; however, the bill fails to include all appropriate AOA certifications and correct AOA terminology. We respectfully request amendments to include osteopathic physicians certified in either pain medicine or pain management, which the AOA recognizes as equal for the purpose of evaluation and treatment of pain. We believe that this change will maintain the intent of the legislation as introduced by ensuring that only qualified physicians with advanced training and competency demonstration in pain treatment can provide this care to Michigan patients.

The AOA represents nearly 130,000 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). MOA is a professional organization that represents over 6,000 DOs providing patient care in Michigan.

**The AOA and MOA request that the language of the bill be amended as follows:**

Sec. 21809. “(3)(a) hold a subspecialty certification in pain management issued by the American Board of Medical Specialties, a certificate of added qualification or a subspecialty certification in pain management or pain medicine issued by the American Osteopathic Association Bureau of Osteopathic Specialists, or an equivalent certification or certificate as determined by the department.

(b) hold a subspecialty certification in hospice and palliative medicine issued by the American Board of Medical Specialties, ~~a certificate of added qualification in hospice and palliative medicine issued by~~ or the American Osteopathic Association Bureau

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of Osteopathic Specialists, or an equivalent certification or certificate as determined by the department.”

**The AOA and MOA appreciate your consideration of our request to amend HB 4404.** Should you need any additional information, please feel free to contact Nicholas A. Schilligo, MS, AOA Associate Vice President of State Government Affairs, at nschilligo@osteopathic.org or (800) 621-1773, ext. 8185.

Sincerely,



Boyd R. Buser, DO  
President, AOA



Bruce Wolf, DO, FAOCR  
President, MOA

CC: Mark A. Baker, DO, AOA President-elect  
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