



From: [Andy Sandusky](#)
To: [ST_RegulatoryCounsel](#)
Subject: [External] 16A-5336 (Licensure by Endorsement and Licensure Requirements)
Date: Friday, June 14, 2024 12:01:57 PM
Attachments: [06-14-2024 POMA Letter on SBOM Regulations.pdf](#)

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To Whom It May Concern:

On behalf of the Pennsylvania Osteopathic Medical Association (POMA), please find attached comments in support of **16A-5336 (Licensure by Endorsement and Licensure Requirements)**.

Please let me know if you have any questions, concerns or difficulty opening the attachment.

Thank you for your time and attention.

Andy Sandusky

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#POMAProud





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June 14, 2024

Board Counsel
State Board of Osteopathic Medicine
P.O. Box 69523
Harrisburg, PA 17106-9523

Re: **Regulation 16A-5336** (Licensure by Endorsement and Licensure Requirements)

SENT VIA EMAIL TRANSITION ONLY

RA-STRegulatoryCounsel@pa.gov

To Whom It May Concern:

I write on behalf of the Pennsylvania Osteopathic Medical Association (POMA) in support of Regulation 16A-5336 which intends to update the State Board of Osteopathic Medicine (SBOM) Regulations on “Licensure by Endorsement and Licensure Requirements.”

In general, POMA supports the proposed regulations because they retain the rigorous requirements for Osteopathic physician licensure but adapt them to the changing and evolving environment. POMA also believes these regulations will support efforts to recruit and retain Osteopathic physicians in the Commonwealth, creating increased access to care for patients.

As stated throughout the proposed rulemaking document POMA supports the policy reasoning articulated by the SBOM for these needed regulations. Rather than restate the excellent reasoning by the SBOM, this letter will provide support for the practical results POMA envisions because of these needed changes.

§25.262 Approved Internships

This section is modernized to reflect changes in graduate training programs for Osteopathic physicians. These changes will help aid in the recruitment of young Osteopathic physicians to remain in Pennsylvania upon completing their residency programs. Further, the regulatory changes in this section will help the Commonwealth in recruiting new physicians from other states, as resident physicians start to look for where they put down their roots and practice Osteopathic medicine. Making it easier to get licensed, because of the very rigorous education and training Osteopathic physicians are required to achieve, makes smart policy that will result in more Osteopathic physicians choosing Pennsylvania as their home, provided needed access to patient care.

§25.251 General Requirements

The changes in this section reflect the evolution of the successful passage of examinations needed for Osteopathic physician licensure. POMA wants to be clear that these changes in no way lower the standards for needed examinations. On the contrary, they reflect the changing environment and resulting best practices to ensure that Osteopathic physicians are tested to the highest standards.

§25.251 Licensure by Endorsement

These new regulations create a smooth pathway to bring seasoned and practicing Osteopathic physicians from other states into the Commonwealth to provide needed access to care.

POMA supports, stands ready to assist in the effort to move Regulation 16A-5336 forward in the most efficient and expeditious manner possible. There is no time to waste bringing the best and the brightest physicians into the Commonwealth to provide access to care. If you have any questions or concerns, please contact POMA staff member Andy Sandusky asandusky@poma.org.

Thank you for your consideration of POMA's support.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Swallow, DO". The signature is fluid and cursive, with a large initial "W" and a long, sweeping underline.

William B. Swallow, DO
POMA President