



**PENNSYLVANIA
OSTEOPATHIC
MEDICAL
ASSOCIATION**

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December 11, 2023

John Bulger, DO, MBA, Chair
Pennsylvania State Board of Osteopathic Medicine
2601 North 3rd Street
Harrisburg, PA 17110

SENT VIA EMAIL TRANSITION ONLY

Dear Dr. Bulger:

I write on behalf of the Pennsylvania Osteopathic Medical Association (POMA) to thank the State Board of Osteopathic Medicine (SBOM) for its good work in providing alternative pathways to address some of the SBOM's current regulations regarding initial licensure and license renewal. POMA also applauds the staff who have been working within the process required to move a final regulatory proposal to change these regulations. POMA continues to support and assist your efforts; however, residents have called POMA expressing their confusion regarding the process. The purpose of this letter is to share these concerns and offer suggestions and support to communicate the SBOM's actions with residents as well as Osteopathic physicians new to the licensure process.

On October 12, 2023, the SBOM approved a motion to temporarily suspend enforcement of the regulation requiring an applicant for an unrestricted license, to complete the COMLEX 2, Physical Exam (PE). The SBOM made this decision because [the PE exam portion of the COMLEX testing was discontinued in June 2022](#). The National Board of Osteopathic Medical Examiners (NBOME) is working with stakeholders to develop a new requirement to accomplish that same goal. POMA shared this decision with its membership, congratulating the SBOM on its efforts.

Unfortunately, to our knowledge, the SBOM has not communicated this decision to physicians seeking licensure. In fact, the SBOM website does not reference this action and further advertises to applicants that COMLEX LEVEL 2-PE is still required without mention of this essential information. This lack of information sharing with the affected licensees creates confusion and frustration, which frequently is reported to POMA.

This issue came to a head on December 1, 2023, prompting this letter. POMA received communication from a pediatric residency program director, informing us that her trainees were told they needed to satisfy the COMLEX 2, Physical Exam (PE) requirement to obtain an unrestricted license. POMA sent an email to the Osteopathic program directors and resident physicians the same day, clarifying this regulation was not being enforced until a successor program is announced.

In response, POMA was challenged to review the SBOM website for accuracy. There is no mention, reference, or link to the temporary enforcement suspension. If POMA is communicating what it knows to be true regarding this regulation, but the SBOM makes no mention of it, licensees are receiving conflicting information. Adding to the confusion, the SBOM vendor approved to provide the examination (Pearson Vue) is directly advertising its services as if the SBOM is enforcing the requirement. POMA is requesting immediate attention by the SBOM to provide clear and updated information on its website on this regulation. This simple action will alleviate confusion surrounding the PE examination that is currently suspended.

John Bulger, DO, MBA, Chair

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The second regulation POMA applauds the SBOM for addressing is the requirement for a one-year rotating Osteopathic internship. The SBOM made the decision not to enforce this regulation to give time for a regulatory change to be promulgated. As we are all aware by this point, the AOA one-year rotating internship does not exist. But again, there is no information being communicated to applicants through the SBOM website on this change. In fact, the website still has a section for applicants to contact the AOA to satisfy a regulation that the SBOM is no longer enforcing. POMA asks that the decision on this regulation be communicated correctly on the SBOM website.

POMA again applauds the SBOM for its work, but respectfully requests immediate action to clarify and provide correct information to applicants for an unrestricted license on the SBOM website. For reference, screenshots of the SBOM website discrepancies are provided in the attachments.

Sincerely,

A handwritten signature in black ink, appearing to read "John J. Kalata". The signature is fluid and cursive, with a prominent initial "J" and "K".

John J. Kalata, DO

POMA President

CC: Arion R. Claggett, Commissioner of the Bureau of Professional and Occupational Affairs

Attachments

Osteopathic Medicine Guide

dos.pa.gov/ProfessionalLicensing/BoardsCommissions/OsteopathicMedicine/Pages/Osteopathic-Medicine-Guide.aspx

Pennsylvania Department of State Business & Charities Professional Licensing Voting & Elections State Athletics

Osteopathic Physician and Surgeon (OS)

An Osteopathic Physician and Surgeon:

- is a graduate of an accredited Osteopathic Medical School
- has passed a three-part national examination, as well as a diagnostic and practical examination
- is fully qualified to perform surgery and prescribe medications
- practices a "whole body" approach to medicine, with a focus on preventative health care
- is specially trained in Osteopathic Manipulative Treatment
- uses their hands to diagnose and treat the patient
- receives extra training in the body's musculoskeletal system - the body's interconnected system of nerves, muscles and bones

Osteopathic Physician Licensure

dos.pa.gov/ProfessionalLicensing/BoardsCommissions/OsteopathicMedicine/Pages/Osteopathic-Physician-Licensure-Requirements-Snapshot.aspx

Pennsylvania Department of State Business & Charities Professional Licensing Voting & Elections State Athletics

Pennsylvania Licensure Requirements

Doctorate Degree	3 Hours of Continuing Education
2 Examinations	185.00 Initial Fee
Complete Approved Internship	420.00 Renewal Fee

- [Osteopathic Medicine Licensure Guide & Timeline](#)
- [Announcements](#)
- [Act 53 of 2020 Best Practices Guide](#)
- [Act 53: Information for Individuals with Criminal Convictions](#)
- [Board Laws & Regulations](#)
- [General Board Information \(includes Applications and Forms\)](#)
- [Licensure Requirements Snapshots](#)
- [Online Services](#)
- [PA Guidelines: Safe Prescribing of Benzodiazepines for Acute Treatment of Anxiety and Insomnia \(PDF\)](#)
- [PA Guidelines: The Safe](#)

The screenshot shows a web browser window with the URL dos.pa.gov/ProfessionalLicensing/BoardsCommissions/OsteopathicMedicine/Pages/Osteopathic-Physician-Licensure-Requirements-Snapshot.aspx. The page is titled "Osteopathic Physician Licensure" and is part of the Pennsylvania Department of State website. The main content area is titled "Examination Requirement:" and includes a sub-section "2 Examinations". The text states: "An applicant must receive passing scores on Parts I, II, and III of the COMLEX-USA examination with results received from the National Board of Osteopathic Medical Examiners. An applicant must also receive a passing score on a practical Osteopathic Manipulative Therapy (OMT) examination in osteopathic diagnosis by one of the following methods:" followed by a bulleted list of methods. A sidebar on the right contains a menu with "Professional Licensing" selected and a list of links including "PA Guidelines: Obstetrics & Gynecology Pain Treatment (PDF)", "PA Guidelines: Opioid Dispensing (PDF)", "PA Guidelines: Use of Addiction Treatment Medications in the Treatment of Pregnant Patients With Opioid Use Disorder (PDF)", "FAQs - Act 125 of 2016 - Prescribing Opioids to Minors (PDF)", "Consent to Prescribe Opioid Medication to a Minor Form (PDF)", "Business & Charities", "Voting & Elections", and "State Athletics".

approved osteopathic medical college.

Examination Requirement:

2 Examinations

An applicant must receive passing scores on Parts I, II, and III of the COMLEX-USA examination with results received from the National Board of Osteopathic Medical Examiners. An applicant must also receive a passing score on a practical Osteopathic Manipulative Therapy (OMT) examination in osteopathic diagnosis by one of the following methods:

- Passing the COMLEX Level 2PPE/Clinical Skills Examination administered by the National Board of Osteopathic Medical Examiners
- Successfully completed an Osteopathic Board Certification examination that included a practical OMT component.
- Successfully completed a practical OMT examination as a requirement for another state license
- Passing the Pennsylvania OMT examination administered by Pearson VUE.

Experience:

Complete Internship

Applicant must successfully complete an approved internship. The State Board will work cooperatively with the

American Osteopathic Association (AOA) under standards established by the Committee on Post-Doctoral Training of the AOA to evaluate and approve internship programs prerequisite to unrestricted licensure in Pennsylvania.

The screenshot shows a web browser window with the URL dos.pa.gov/ProfessionalLicensing/BoardsCommissions/OsteopathicMedicine/Pages/Examination-Information.aspx. The page is titled "Board Examination Information" and is part of the Pennsylvania Department of State website. The breadcrumb trail is "Medicine > Examination Information". The main heading is "Board Examination Information" followed by "Osteopathic Doctors". The text states: "Pennsylvania Osteopathic Manipulation Therapy (OMT) Examination:" followed by contact information for Pearson VUE. A search icon and a menu icon are visible in the top right corner.

Medicine > Examination Information

Board Examination Information

Osteopathic Doctors

Pennsylvania Osteopathic Manipulation Therapy (OMT) Examination:

For examination information contact: [Pearson VUE](https://www.pearsonvue.com/pa/osteopathic-medicine/), 5601 Green Valley Drive, Bloomington, MN 55437. Phone: 1-877-883-1370. Website: <http://www.pearsonvue.com/pa/osteopathic-medicine/>

