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National Board of Osteopathic Medical Examiners
LD 2233

The National Board of Osteopathic Medical Examiners (NBOME) writes to express our support for maintaining a separate and independent Maine Board of Osteopathic Licensure (BOL) to serve a key role in professional self-regulation for the practice of osteopathic medicine in support of the care of patients in the state of Maine. We believe the patients and the medical profession are best served by a separate and distinct osteopathic medical board in Maine, as well as a separate and distinct Maine Board of Licensure in Medicine (BOLIM), without merging the two together as a single Board.

We believe having a separate and distinct BOL and BOLIM remains critical in protecting the public and positioning the state for responsiveness to projections for further physician shortages particularly in rural and other underserved areas in Maine. As there are already licensure categories the BOLIM oversees that do not apply to DOs (IMGs) and this will undoubtedly increase if the pending legislation creating alternate pathways for IMGs is approved, it does not make sense to burden osteopathic board members with oversight for licensing categories that do not apply to osteopathic physicians.

From the financial models presented by the Board Merger Workgroup, it did not appear that a complete financial projection for a merged Board was presented or that there would be cost efficiencies to creating a single board. As the BOL appears to be financially self-sustaining at present and also appears to have funding for additional staff that has not yet been resourced for that purpose, there is no clear financial benefit to the state or taxpayers from merging the boards. On the contrary, eliminating the BOL and the BOLIM and creating a new board would likely involve new administrative and training costs and will likely disrupt the efficient service that the BOL currently provides. Additional costs incurred due to the complexities of monitoring of IMGs in the future will be more efficiently managed by a separate BOLIM, not complicating professional self-regulation or DOs. While the BOL may be currently understaffed, adding some additional staff to the BOL and contracting between boards for select services such as IT support (as is done in numerous states) appears to be a more economically efficient approach rather than consolidating the Boards.

Additionally, the proposed merger will unfairly impact and burden DOs by doubling the initial license costs for osteopathic physicians. Current initial license fees for an osteopathic physician license are \$350 while the initial license fees for MDs are \$700 (\$600 application fee plus \$100 "exam" fee) and the proposed legislation would raise DO licensure to \$700. This significant increase is unnecessary as the BOL currently covers all of its expenses with the existing \$350 fee.

For these reasons, the NBOME supports the continued maintenance of separate boards. We believe that appropriately staffed, separate and distinct boards for DOs and MDs is the solution that is in the best interests of the Board's stakeholder DO physicians and the patients in Maine. We thank the Committee for their consideration of this important issue.