December 10, 2018

The Honorable Mike Shirkey
Chair, Committee on Health Policy
Michigan Senate
201 Townsend Street
Connie B. Binsfeld Office Building, Suite 5300
Lansing, MI 48933

Dear Chairman Shirkey:

On behalf of the more than 13,800 U.S. members of the American Academy of Dermatology Association ("Academy") and the Michigan Dermatological Society (MDS), we write in support of House Bill 4134, which would prohibit Michigan’s Department of Health and Boards of Medicine and Osteopathic Medicine from requiring a physician to participate in maintenance of certification (MOC) as a condition of medical licensure or renewal. Dermatologists diagnose and treat more than 3,000 diseases, including skin cancer, psoriasis, immunologic diseases and many genetic disorders, and the Academy and MDS steadfastly support lifelong continuing professional development in dermatology with the goal of improving patient care outcomes. We believe existing state licensure requirements, such as continuing medical education, achieve this goal. For the reasons below, we urge members of the Senate Committee on Health Policy to support legislative efforts to prohibit linking participation in the MOC program to maintaining one’s medical licensure.

The Academy and MDS are committed to ensuring our patients receive high-quality dermatologic care by physicians who are certified by the American Board of Dermatology (ABD). We have worked with the ABD to enhance the relevance of MOC, with the lowest burden to our colleagues, while maintaining the high standards that board certification promises to our patients.

Despite the Academy’s commitment to improving the ABD’s MOC process, we strongly oppose conditioning one’s medical license on participation in maintenance of certification. We are concerned that qualified dermatologists will refrain from renewing their license or seeking employment in Michigan if physicians are forced to participate in MOC in order to practice medicine. Many physicians view participation in MOC as too burdensome due to the time commitment and cost. Requiring MOC as a condition of licensure may force a number of the
physicians in Michigan into early retirement and decrease the number of dermatologists who otherwise would seek licensure in Michigan.

The unintended effect is that linking MOC to licensure will likely exacerbate an existing physician shortage by imposing unnecessary barriers to patient care.

One in four Americans suffers from a skin disease. As dermatologists on the front lines fighting skin cancer and treating numerous skin diseases, the Academy and MDS appreciate the opportunity to provide written comments on this important issue. State licensure decisions should be based on a broader set of criteria for assessing competence, including criteria that has demonstrated improvement in patient outcome. We urge your support of HB 4134, which would prevent further reduction of the physician workforce in Michigan. For further information, please contact Lisa Albany, director, state policy, at lalbany@aad.org (202) 842-3555.

Sincerely,

Suzanne Olbricht, MD
President
American Academy of Dermatology Association

Joseph Warren McGoey, MD, FAAD
President
Michigan Dermatological Society

CC: Members of the Senate Committee on Health Policy