

**Title 20—DEPARTMENT OF INSURANCE, FINANCIAL INSTITUTIONS
AND PROFESSIONAL REGISTRATION
Division 2150—State Board of Registration for the Healing Arts
Chapter 2—Licensing of Physicians and Surgeons**

ORDER OF RULEMAKING

By the authority vested in the State Board of Registration for the Healing Arts under sections 334.045 and 334.046, RSMo 2000, sections 334.090 and 334.100, RSMo Supp. 2013 and sections 334.036, 334.038, and 334.125, RSMo Supp. 2014, the board adopts a rule as follows:

20 CSR 2150-2.001 Definitions is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on August 1, 2016 (41 MoReg 963-964). Those sections with changes are reprinted here. This proposed rule becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The board received three (3) comments on the proposed rule.

COMMENT #1: A comment was received from Washington University in St. Louis School of Medicine (WUSTL) stating that section (2)(D) indicates that an assistant physician applicant must submit proof of graduation from an “approved medical school,” a term that is defined under 20 CSR 2150-2.100, as: “a medical school accredited by the Liaison Committee on Medical Education of the American Medical Association, the American Osteopathic Association’s Commission on Osteopathic College Accreditation, or that appears in the World Directory of Medical Schools or its successor.” However, the statute creating the assistant physician licensure is not crafted this broadly. Section 334.036, RSMo, defines “medical school graduate,” for purposes of assistant physician licensure, as “any person who has graduated from a medical college or osteopathic medical college described in section 334.031.” Section 334.031, RSMo, in turn, clarifies that “Any medical college approved and accredited as reputable by the American Medical Association or the Liaison Committee on Medical Education and any osteopathic college approved and accredited as reputable by the American Osteopathic Association is deemed to have complied with the requirements of this subsection.” This section makes no mention of the World Directory; the only accrediting bodies mentioned are the American Medical Association (AMA), Liaison Committee on Medical Education (LCME) or American Osteopathic Association (AOA). By opening assistant physician licensure to graduates from schools listed on the World Directory, a student from any international school of medicine could obtain licensure as an assistant physician. Given its responsibility for assuring that assistant physician licensees have some common standard or background in medical education, the Board should be aware that the World Directory is not an accrediting body. Its mission statement reads: It is the mission of the *World Directory of Medical Schools (World Directory)* to list all of the medical schools in the world...*The listing of a medical school in the World Directory of Medical Schools does not denote recognition, accreditation, or endorsement by the World Directory of*

Medical Schools *or its partner organizations...*” Being listed on the World Directory does not represent any measure or standard of competency by a given school. The rule should remove this reference to the World Directory and be consistent with the statute which states that accreditation by the AMA, AOA or LCME meet the specified standard of medical education.

RESPONSE AND EXPLANATION OF CHANGE: The Board appreciates the comments and amends the language as suggested to incorporate the standard for medical schools as outline in section 334.031.1, RSMo.

COMMENT #2: A comment was received from the Missouri Academy of Family Physicians (MAFP) suggesting section (9) be amended to change the “Accreditation Counsel (should be “Council”) on Graduate Medical Education (ACGME)” is not part of the American Medical Association (since 2000, per ACGME website: <http://www.acgme.org/About-Us/Overview/ACGME-History>); and the “Education Committee” of the American Osteopathic Association has been changed to “Program and Trainee Review Council”.

RESPONSE AND EXPLANATION OF CHANGE: The Board appreciates the comments and amends the language as suggested.

COMMENT #3: A comment was received from the Missouri Academy of Family Physicians (MAFP) suggesting section (15) be amended to change “family practice medicine” to “family medicine” to reflect the specialty of integrated care for all patients in the delivery of acute, chronic, and preventive medical care services.

RESPONSE AND EXPLANATION OF CHANGE: The Board appreciates the comments and amends the language as suggested.

20 CSR 2150-2.001 Definitions

- (3) Approved medical school—a medical school accredited by the Liaison Commission on Medical Education of the American Medical Association or the American Osteopathic Association’s Commission on Osteopathic College Accreditation, or other medical school program that enforces requirements of four terms of thirty-two weeks for actual instruction in each term, including, in addition to class work, such experience in operative and hospital work during the last two years of instruction as is required by the American Medical Association and the American Osteopathic Association.
- (9) Hospitals approved by the board—all hospitals who are part of a residency training program approved and accredited to teach graduate medical education by the Accreditation Council on Graduate Medical Education (ACGME) of the American Medical Association or the Program and Trainee Review Council of the American Osteopathic Association.
- (15) Primary care—physician services in family medicine, general practice, internal medicine, pediatrics, obstetrics, or gynecology. This shall not include surgery other than minor office based procedures.