

# Administrative Rule Analysis



## OSTEOPATHIC MEDICINE AND SURGERY – GENERAL RULES

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**Rule Set No.: 2023-36 LR**  
**Submitted to JCAR on: 10/9/24**

Analysis available at  
<http://www.legislature.mi.gov>

**Department: Licensing and Regulatory Affairs**  
**Agency: Bureau of Professional Licensing**  
**Enabling Statute: Public Health Code, 1978 PA 368, MCL 333.16145, 333.16148, 333.16174, 333.16201, 333.16204, 333.16215, 333.16287, 333.17531, 333.17533, and 333.17548 et seq.**

**Analysis Complete to: 10/17/24**

## BACKGROUND AND SUMMARY OF PROPOSED RULES

Rule Set 2023-36 LR would make numerous amendments to the rules pertaining to the osteopathic medicine profession. The changes would accomplish the following:

- Add definitions
- Remove prohibition on physician delegation of a drug or device for pregnant women intending to cause fetal death
- Update accreditation standards to reflect the latest educational standards
- Raise the fee for copies of standards adopted by reference from a rate of \$0.10 per page to \$0.25 cents per page
- Reduce the number of attempts allowed on any level of the COMLEX examination, in order to remain consistent with the National Board of Osteopathic Medical Examiners
- Rescind requirement for passing all levels of the COMLEX examination in specified timeframe
- Allow renewing licensees to submit continuing education waiver requests by a specified time
- Allow implicit bias training to count toward continuing education requirements
- Allow a maximum of 90 continuing education credits to be completed through presentations

## FISCAL IMPACT OF PROPOSED RULES

2023-36 LR is not anticipated to affect the expenditures or revenues of any state or local government units. Any fiscal impact from the fee increase related to copies of standards adopted by reference would likely be minimal, and thus would not have any appreciable impact on revenue for the Department of Licensing and Regulatory Affairs.

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■ This analysis was prepared by nonpartisan House Fiscal Agency staff for use by House members in their deliberations, and does not constitute an official statement of legislative intent.