



Comments on MOC draft

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To: Ben Steffen <ben.steffen@maryland.gov>, Megan Renfrew -MDH- <megan.renfrew@maryland.gov>

Ben and Megan,
 Thanks for sharing the draft MOC report.
 Here are my comments.
 Dan

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You've done a good job here. My suggestions are below.

The key structural stylistic point is to add a topic sentence defining the position/conclusion followed by the explanation. I think that will make it clearer to readers who will not read every paragraph carefully.

Added language in *italics* below.

Page 3:

Justification for recertification requirements

Delete the first two paragraphs in this section and replace with:

All parties agree that CME (continuing medical education) is important and valuable and should continue at the current levels. However, there is no definitive evidence that recertification is connected to quality or improved outcomes, despite over 10 years of experience with the recertification process. Currently, there are studies on both sides of the issue with some studies suggesting value and others that do not. This was highly debated in the work group.

Further, it should be noted that there are numerous other means of assessing physician capabilities, including real-time case reviews via electronic health records; hospital re-credentialing process; billing reviews and authorizations by insurance companies on a case-by-case basis; and every 2-year licensing renewal process done by the Maryland Board of Physicians. These are comprehensive reviews and can include information about patient complaints, malpractice suits, feedback from other professionals, and any other aspect of practice.

Page 5: last paragraph

This should begin as follows: *"There is no evidence that a hospital's Joint Commission accreditation status would be affected by a change in recertification process."* Then continue as before with "Some work group members...."

Page 8: Under "Additional Finding:" section

This should begin as follows: *"Changing recertification requirements will not impact insurance participation by or reimbursement to physicians or hospitals."* The next sentence should be modified in the middle to read " *Although insurers who were represented on the workgroup did not support legislation that would prohibit....*" then continue as before.