



State of West Virginia *Board of Medicine*

KISHORE K. CHALLA, MD, FACC
PRESIDENT

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ASHISH P. SHETHI, MD
VICE PRESIDENT

MARK A. SPANGLER, MA
EXECUTIVE DIRECTOR

SUMMARY OF COMMENTS RECEIVED REGARDING PROPOSED BOARD OF MEDICINE RULE 11 CSR 14 AND RESPONSES OF THE WEST VIRGINIA BOARD OF MEDICINE

On April 23, 2020, the West Virginia Board of Medicine filed a Notice of Comment Period on a Proposed Rule, 11 CSR 14. The notice established a thirty-day comment period on the proposed rule, which concluded at 4:30 pm on May 23, 2020. During the comment period, the Board received comments for the following thirteen individuals:

Commenter	Date Received
1. Josya-Gony Charles MD, MS	April 23, 2020
2. Meagan Simpson, MD	April 23, 2020
3. Robert Wood, PhD, MD	April 23, 2020
4. Mary	April 23, 2020
5. John R. Vanin, MD	April 23, 2020
6. Taylor Fithian, MD	April 23, 2020
7. Tony C. Majestro	April 23, 2020
8. Reed	April 23, 2020
9. Francis K. Le, MD	April 24, 2020
10. John Brick	April 24, 2020
11. Ghulam Abbas, MD	April 24, 2020
12. Jeremiah Hayanga, MD, MPH, FACS	April 25, 2020
13. Saghirmd@aol.com	April 29, 2020

The board received the following comments and responds as follows:

Commenter	Comment	BOM Response
1	As a locums doctor who works and hold licenses in several states expediting the ability for emergency privileges serves to benefits the residents of that state. Therefore I agree with the proposed rule.	The Board appreciates the commenter taking the time to contact the Board in support of the rule. The Board has not modified the proposed rule as a result of this comment.

2	<p>Emergency services from out of state should be limited to physicians. Not mid levels. There is too much disparity in their training and in an emergency situation we may not have enough physicians to properly oversee them. If you want to open up more broadly, it would be better to allow physicians boarded in other specialties to practice in and needed role rather than a PA or NP. Physicians have had significantly more training, regardless of further sub-specialization. Physicians also know their limitations, whereas my experience with midlevels has time and again proven that a little bit of knowledge or experience can be very dangerous.</p>	<p>The proposed rule provides a registration process for emergency practice by out of state and retired West Virginia physicians and physician assistants. This is consistent with the gubernatorially implemented statutory suspensions during the COVID-19 State of Emergency. The rule does not abrogate the collaboration process. PAs with emergency registrations must practice in collaboration with physicians. Additionally, there is no prohibition in statute or rule that would prohibit a physician from practicing in a needed role, even if the role is different from the physician's designated area of specialty.</p> <p>The Board appreciates these thoughtful comments, but for the reasons stated, the Board has not modified the proposed rule as a result of this comment.</p>
3	<p>What is the status of physicians out of state who wish to hold telemedicine encounters with West Virginia patients, already in their established practice?</p>	<p>11 CSR 14 provides a streamlined process for out of state physicians to register for West Virginia practice. Registered physicians are authorized to practice telemedicine to established and new West Virginia patients. The Board has not modified the proposed rule as a result of this comment.</p>
4	<p>It is good idea. It will allow telemedicine for pts who would ordinarily have to cross border to legally FaceTime their docs Stay Home Stay Safe</p>	<p>The Board appreciates the commenter taking the time to contact the Board in support of the rule. The Board has not modified the proposed rule as a result of this comment.</p>

5	<p>Regarding proposed BOM Rule 11 CSR 14 Registration to Practice During Declared State of Emergency, the attached proposal looks very good. Ensuring the validity of existing licenses or the validity of the inactive/expired licenses is crucial. Also, there probably needs to be a mechanism to ensure that the practitioners who have not actively practiced in a while are “up to the task” of practicing medicine again. One thought on this would be the practitioners with inactive/ expired licenses perhaps working with an actively practicing physician at the time.</p> <p>Overall an excellent proactive proposal.</p>	<p>The Board appreciates these thoughtful comments. The Board agrees that validation of existing license is crucial, and the proposed rule includes a requirement to this effect at 11 CSR 14.2.2.1. The Board also agrees that it is important to ensure retired/inactive providers are “up to the task” of returning to active practice. In furtherance of this concern, the proposed rule includes the following registration eligibility factors for retired/inactive providers:</p> <p><u>3.2.1. Have had an active clinical practice within the last five years;</u></p> <p><u>3.2.2. No longer hold an active status medical or physician assistant license in any state;</u></p> <p><u>3.2.3. Not have surrendered a medical license or physician assistant license while under investigation or had a license revoked in any jurisdiction, unless the revocation was subsequently withdrawn or overturned; and</u></p> <p><u>3.2.4. Have been in good standing at the time the physician’s West Virginia medical license or the physician assistant’s West Virginia physician assistant license became inactive or expired.</u></p> <p>The Board considers that these factors balance the need to ensure current qualifications with the need to surge provider availability during a declared state of emergency. The Board has not modified the proposed rule as a result of this comment.</p>
6	<p>I approve and support rule 11 CSR 14.</p>	<p>The Board appreciates the commenter taking the time to contact the Board in support of the rule. The Board has not modified the proposed rule as a result of this comment.</p>

SUMMARY OF COMMENTS RECEIVED REGARDING
PROPOSED BOARD OF MEDICINE RULE 11 CSR 14 AND
RESPONSES OF THE WEST VIRGINIA BOARD OF MEDICINE
Page 4 of 7

7	Do not see a need. Most Doctors are only working part time at present.	The Board appreciates this thoughtful comment, which accurately depicted the reality for many physicians during the period of time when elective procedures were prohibited by Executive Order. This rule is intended to provide a mechanism for safe and effective provider surge during declared states of emergency, including but not limited to the current State of Emergency. Accordingly, the Board has not modified the proposed rule as a result of this comment.
8	<p>Emergency responders</p> <ol style="list-style-type: none"> 1. What about malpractice coverage to protect both provider and providee? 2. 5.4 report also to physicians national databank 3. Is there a way to recognize individuals who offer their help? 	<p>The Board appreciates these thoughtful comment/questions from the commenter and provides the following responses:</p> <ol style="list-style-type: none"> 1. While addressing malpractice coverage for emergency providers has merit, the proposed rule does not address malpractice coverage. The Board does not have the jurisdiction or statutory authority to make rules regarding malpractice coverage and therefore has not endeavored to do so in this proposed rule. 2. Federal law establishes reporting requirements for the National Practitioners Data Bank (NPDB) at 45 C.F.R. § 60. The NPDB is a nationwide is a web-based repository of reports “on medical malpractice payments and certain adverse actions related to health care practitioners, providers, and suppliers.” The Board will make all appropriate reports to the NPDB but cannot establish its own criteria for making such

		<p>reports.</p> <p>3. The Board is unaware of any specific process for recognizing providers who practice during a declared state of emergency. This may be a question for another entity. The proposed rule permits the Board to issue an emergency authorization to qualified applicants to practice in West Virginia during a declared state of emergency.</p> <p>The Board has not modified the proposed rule as a result of this comment.</p>
9	<p>I would like to comment that during the COVID-19 crisis, it would be a good idea to allow healthcare providers from other states who hold active licenses to have emergency privileges to practice medicine in West Virginia. However, I disagree that healthcare providers who are retired or hold inactive licenses to start practicing. There are healthcare providers that allowed their licenses to lapse because of underlying/ hidden issues and were aware that through investigations, it would have revealed skeletons. Moreover, if a retired healthcare provider starts practicing again, there is a lapse in clinical knowledge and skills. This lack can be dangerous for patient care. Therefore, I recommend that only licensed healthcare providers who hold active licenses and are currently practicing medicine or within the last 12 months be allowed to have emergency privileges to practice medicine.</p>	<p>The Board appreciates these thoughtful comments and agrees that it is important to ensure retired/inactive providers are able to provide clinically appropriate care and have not left practice due to "underlying/hidden issues." In furtherance of this concern, the proposed rule includes the following registration eligibility factors for retired/inactive providers:</p> <p><u>3.2.1. Have had an active clinical practice within the last five years;</u></p> <p><u>3.2.2. No longer hold an active status medical or physician assistant license in any state;</u></p> <p><u>3.2.3. Not have surrendered a medical license or physician assistant license while under investigation or had a license revoked in any jurisdiction, unless the revocation was subsequently withdrawn or overturned; and</u></p> <p><u>3.2.4. Have been in good standing at the time the physician's West Virginia medical license or the physician assistant's West Virginia physician assistant license became inactive or expired.</u></p> <p>The Board considers that these factors balance the need to ensure</p>

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PROPOSED BOARD OF MEDICINE RULE 11 CSR 14 AND
RESPONSES OF THE WEST VIRGINIA BOARD OF MEDICINE
Page 6 of 7

		current qualifications with the need to surge provider availability during a declared state of emergency. The Board has not modified the proposed rule as a result of this comment.
10	The rule looks fine to me.	The Board appreciates the commenter taking the time to contact the Board in support of the rule. The Board has not modified the proposed rule as a result of this comment.
11	<p>Thank you very much for the opportunity to submit comment on the proposed rule 11 CSR 14, <i>Registration to Practice During Declared State of Emergency</i>. I am in full support of this proposed rule but would like to add another category.</p> <p>I recommend all physician with valid limited license should be allowed to practice anywhere in the state too.</p>	<p>The Board appreciates the commenter taking the time to contact the Board in support of the rule. This rule is not intended to modify the terms or conditions of a license issued by the Board of Medicine. It is intended to provide eligibility criteria for persons who are not licensed within the state of West Virginia to practice within the state during a declared state of emergency. If a person has a license, he or she has completed the Board's full licensure process, and has been granted a license which is commiserate with his or her qualifications and the requirements and limitations imposed by the West Virginia Medical Practice Act. Consequently, the Board has not modified the proposed rule as a result of this comment.</p>
12	This is an excellent idea to increase the number of providers in the state. It may likely also be of pragmatic utility, even after the pandemic, to allow providers who are licensed and in good standing in neighboring states to be granted WV licensure by allowing reciprocity even where the 10-year rule is not fulfilled.	The Board appreciates the commenter taking the time to contact the Board in support of the concept of this rule and takes the comment regarding future changes to the Medical Practice Act under advisement. The Board has not modified the proposed rule as a result of this comment.

13	WHAT ABOUT CME HOURS being effected due to pandemic , to renew licence?	The Board appreciates the commenter taking the time to contact the Board regarding 11 CSR 14. This comment appears to be directed to the unrelated issue of license renewal. The Board has extended the 2020 renewal deadline, and the associated deadline to complete continuing medical education, for ninety days, until September 30, 2020. The Board has not modified the proposed rule as a result of this comment.
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Conclusion

The Board again expresses its sincere appreciate to all who submitted comments. Review of these comments was helpful to the Board's rulemaking process. The Board has reviewed the comments carefully and believe that the rule as currently proposed satisfactorily addresses the underlying issues which prompted all material comments. Additionally, some comments are incompatible with the Board's current statutory authority and are outside the scope of the currently proposed rule. The Board's agency approved filing does not include any modifications to the proposed rule.

Frame, Jamie C

Subject: FW: Comment Period Underway for Proposed Board of Medicine Rule

From: Dr. Josya-Gony Charles MD <onthemovemedicine@gmail.com>
Sent: Thursday, April 23, 2020 6:41 PM
To: WV BOM <wvbom@wv.gov>
Subject: Re: Comment Period Underway for Proposed Board of Medicine Rule

Greetings,

As a locums doctor who works and hold licenses in several states expediting the ability for emergency privileges serves to benefits the residents of that state.
Therefore I agree with the proposed rule.

Respectfully,

Josya-Gony Charles MD, MS

On Thu, Apr 23, 2020 at 1:59 PM <wvbom@wv.gov> wrote:

April 23, 2020

The West Virginia Board of Medicine is accepting written comments on proposed rule 11 CSR 14, *Registration to Practice During Declared State of Emergency*. This rule, which is also being promulgated as an emergency rule, creates an emergency registration process to allow physicians and physician assistants licensed in another state, and eligible physicians and physician assistants who currently hold either an inactive or expired status West Virginia license, to provide medical care in West Virginia under special provisions during a declared State of Emergency. The proposed rule is available for review and comment.

All comments must be received by 4:30 pm on May 23, 2020, and should be submitted to:

Mark A. Spangler, Executive Director
West Virginia Board of Medicine
101 Dee Drive, Suite 103
Charleston, West Virginia 25311
Mark.A.Spangler@wv.gov

--
Josya-Gony Charles MD, MS

Frame, Jamie C

Subject: FW: Comment Period Underway for Proposed Board of Medicine Rule

From: Meagan Simpson <mmcgini@gmail.com>
Sent: Thursday, April 23, 2020 6:26 PM
To: WV BOM <wvbom@wv.gov>
Subject: Re: Comment Period Underway for Proposed Board of Medicine Rule

Good afternoon,

Emergency services from out of state should be limited to physicians. Not mid levels. There is too much disparity in their training and in an emergency situation we may not have enough physicians to properly oversee them. If you want to open up more broadly, it would be better to allow physicians boarded in other specialties to practice in and needed role rather than a PA or NP. Physicians have had significantly more training, regardless of further sub-specialization. Physicians also know their limitations, whereas my experience with midlevels has time and again proven that a little bit of knowledge or experience can be very dangerous.

Respectfully,
M. Simpson, MD

On Apr 23, 2020, at 2:12 PM, wvbom@wv.gov wrote:

April 23, 2020

The West Virginia Board of Medicine is accepting written comments on proposed rule 11 CSR 14, *Registration to Practice During Declared State of Emergency*. This rule, which is also being promulgated as an emergency rule, creates an emergency registration process to allow physicians and physician assistants licensed in another state, and eligible physicians and physician assistants who currently hold either an inactive or expired status West Virginia license, to provide medical care in West Virginia under special provisions during a declared State of Emergency. The [proposed rule](#) is available for review and comment.

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Mark A. Spangler, Executive Director
West Virginia Board of Medicine
101 Dee Drive, Suite 103
Charleston, West Virginia 25311
Mark.A.Spangler@wv.gov

Frame, Jamie C

Subject: FW: Comment Period Underway for Proposed Board of Medicine Rule

From: Wood, Robert <RobertE.Wood@cchmc.org>
Sent: Thursday, April 23, 2020 6:24 PM
To: WV BOM <wvbom@wv.gov>
Subject: RE: Comment Period Underway for Proposed Board of Medicine Rule

What is the status of physicians out of state who wish to hold telemedicine encounters with West Virginia patients, already in their established practice?

Robert E. Wood, PhD, MD
Professor, Pediatrics and Otolaryngology
Division of Pulmonary Medicine MLC 7041
Cincinnati Children's Hospital
3333 Burnet Ave
Cincinnati, OH 45229-3039
513 636 2776
513 636 3845 fax
roberte.wood@cchmc.org

From: wvbom@wv.gov <wvbom@wv.gov>
Sent: Thursday, April 23, 2020 2:18 PM
To: Wood, Robert <RobertE.Wood@cchmc.org>
Subject: Comment Period Underway for Proposed Board of Medicine Rule

April 23, 2020

The West Virginia Board of Medicine is accepting written comments on proposed rule 11 CSR 14, *Registration to Practice During Declared State of Emergency*. This rule, which is also being promulgated as an emergency rule, creates an emergency registration process to allow physicians and physician assistants licensed in another state, and eligible physicians and physician assistants who currently hold either an inactive or expired status West Virginia license, to provide medical care in West Virginia under special provisions during a declared State of Emergency. The proposed rule is available for review and comment.

All comments must be received by 4:30 pm on May 23, 2020, and should be submitted to:

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West Virginia Board of Medicine
101 Dee Drive, Suite 103
Charleston, West Virginia 25311
Mark.A.Spangler@wv.gov

Frame, Jamie C

Subject: FW: Comment Period Underway for Proposed Board of Medicine Rule

From: Mary <wonkin@aol.com>
Sent: Thursday, April 23, 2020 7:28 PM
To: WV BOM <wvbom@wv.gov>
Subject: Re: Comment Period Underway for Proposed Board of Medicine Rule

It is good idea. It will allow telemedicine for pts who would ordinarily have to cross border to legally FaceTime their docs Stay Home Stay Safe

Sent from my iPhone

On Apr 23, 2020, at 2:04 PM, wvbom@wv.gov wrote:

April 23, 2020

The West Virginia Board of Medicine is accepting written comments on proposed rule 11 CSR 14, *Registration to Practice During Declared State of Emergency*. This rule, which is also being promulgated as an emergency rule, creates an emergency registration process to allow physicians and physician assistants licensed in another state, and eligible physicians and physician assistants who currently hold either an inactive or expired status West Virginia license, to provide medical care in West Virginia under special provisions during a declared State of Emergency. The [proposed rule](#) is available for review and comment.

All comments must be received by 4:30 pm on May 23, 2020, and should be submitted to:

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West Virginia Board of Medicine
101 Dee Drive, Suite 103
Charleston, West Virginia 25311
Mark.A.Spangler@wv.gov

Frame, Jamie C

Subject: FW: Comment Period Underway for Proposed Board of Medicine Rule

From: John Vanin <JVANIN@COMCAST.NET>
Sent: Thursday, April 23, 2020 7:37 PM
To: WV BOM <wvbom@wv.gov>
Subject: Re: Comment Period Underway for Proposed Board of Medicine Rule

Mark,

Regarding proposed BOM Rule 11 CSR 14 Registration to Practice During Declared State of Emergency, the attached proposal looks very good. Ensuring the validity of existing licenses or the validity of the inactive/expired licenses is crucial. Also, there probably needs to be a mechanism to ensure that the practitioners who have not actively practiced in a while are "up to the task" of practicing medicine again. One thought on this would be the practitioners with inactive/ expired licenses perhaps working with an actively practicing physician at the time. Overall an excellent proactive proposal.

John R. Vanin MD
WV 11453

Sent from my iPad

On Apr 23, 2020, at 2:14 PM, wvbom@wv.gov wrote:

April 23, 2020

The West Virginia Board of Medicine is accepting written comments on proposed rule 11 CSR 14, *Registration to Practice During Declared State of Emergency*. This rule, which is also being promulgated as an emergency rule, creates an emergency registration process to allow physicians and physician assistants licensed in another state, and eligible physicians and physician assistants who currently hold either an inactive or expired status West Virginia license, to provide medical care in West Virginia under special provisions during a declared State of Emergency. The [proposed rule](#) is available for review and comment.

All comments must be received by 4:30 pm on May 23, 2020, and should be submitted to:

Mark A. Spangler, Executive Director
West Virginia Board of Medicine
101 Dee Drive, Suite 103
Charleston, West Virginia 25311
Mark.A.Spangler@wv.gov

Frame, Jamie C

Subject: FW: [EXT] Comment Period Underway for Proposed Board of Medicine Rule

From: Taylor Fithian <Taylor.Fithian@Wellpath.us>
Sent: Thursday, April 23, 2020 7:49 PM
To: WV BOM <wvbom@wv.gov>
Cc: Spangler, Mark A <Mark.A.Spangler@wv.gov>
Subject: Re: [EXT] Comment Period Underway for Proposed Board of Medicine Rule

I approve and support rule 11 CSR 14.
W. Taylor Fithian, MD I

Sent from my iPhone

On Apr 23, 2020, at 2:02 PM, "wvbom@wv.gov" <wvbom@wv.gov> wrote:

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April 23, 2020

The West Virginia Board of Medicine is accepting written comments on proposed rule 11 CSR 14, *Registration to Practice During Declared State of Emergency*. This rule, which is also being promulgated as an emergency rule, creates an emergency registration process to allow physicians and physician assistants licensed in another state, and eligible physicians and physician assistants who currently hold either an inactive or expired status West Virginia license, to provide medical care in West Virginia under special provisions during a declared State of Emergency. The proposed rule (apps.sos.wv.gov/) is available for review and comment.

All comments must be received by 4:30 pm on May 23, 2020, and should be submitted to:

Mark A. Spangler, Executive Director
West Virginia Board of Medicine
101 Dee Drive, Suite 103
Charleston, West Virginia 25311
Mark.A.Spangler@wv.gov

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Frame, Jamie C

Subject: FW: Comment Period Underway for Proposed Board of Medicine Rule

From: Tony C. Majestro <tmajestro@suddenlink.net>

Sent: Thursday, April 23, 2020 8:20 PM

To: WV BOM <wvbom@wv.gov>

Subject: Re: Comment Period Underway for Proposed Board of Medicine Rule

Do not see a need. Most Doctors are only working part time at present.

Sent from my iPhone

On Apr 23, 2020, at 2:07 PM, wvbom@wv.gov wrote:

April 23, 2020

The West Virginia Board of Medicine is accepting written comments on proposed rule 11 CSR 14, *Registration to Practice During Declared State of Emergency*. This rule, which is also being promulgated as an emergency rule, creates an emergency registration process to allow physicians and physician assistants licensed in another state, and eligible physicians and physician assistants who currently hold either an inactive or expired status West Virginia license, to provide medical care in West Virginia under special provisions during a declared State of Emergency. The [proposed rule](#) is available for review and comment.

All comments must be received by 4:30 pm on May 23, 2020, and should be submitted to:

Mark A. Spangler, Executive Director

West Virginia Board of Medicine

101 Dee Drive, Suite 103

Charleston, West Virginia 25311

Mark.A.Spangler@wv.gov

Frame, Jamie C

Subject: FW: Comment Period Underway for Proposed Board of Medicine Rule

From: Reed <jbreed1@frontier.com>
Sent: Thursday, April 23, 2020 8:20 PM
To: WV BOM <wvbom@wv.gov>; Spangler, Mark A <Mark.A.Spangler@wv.gov>
Subject: RE: Comment Period Underway for Proposed Board of Medicine Rule

Emergency responders

1. What about malpractice coverage to protect both provider and providee?
2. 5.4 report also to physicians national databank
3. Is there a way to recognize individuals who offer their help?

From: wvbom@wv.gov [mailto:wvbom@wv.gov]
Sent: Thursday, April 23, 2020 2:11 PM
To: jbreed1@frontier.com
Subject: Comment Period Underway for Proposed Board of Medicine Rule

April 23, 2020

The West Virginia Board of Medicine is accepting written comments on proposed rule 11 CSR 14, *Registration to Practice During Declared State of Emergency*. This rule, which is also being promulgated as an emergency rule, creates an emergency registration process to allow physicians and physician assistants licensed in another state, and eligible physicians and physician assistants who currently hold either an inactive or expired status West Virginia license, to provide medical care in West Virginia under special provisions during a declared State of Emergency. The proposed rule is available for review and comment.

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Mark A. Spangler, Executive Director
West Virginia Board of Medicine
101 Dee Drive, Suite 103
Charleston, West Virginia 25311
Mark.A.Spangler@wv.gov



Virus-free. www.avq.com

Frame, Jamie C

Subject: FW: [External] Proposed new rule for health care providers to practice medicine in WV.

From: Francis.Le@hcahealthcare.com <Francis.Le@hcahealthcare.com>

Sent: Thursday, April 23, 2020 5:41 PM

To: Spangler, Mark A <Mark.A.Spangler@wv.gov>

Subject: [External] Proposed new rule for health care providers to practice medicine in WV.

CAUTION: External email. Do not click links or open attachments unless you verify sender.

Dear Sir,

I would like to comment that during the COVID-19 crisis, it would be a good idea to allow healthcare providers from other states who hold active licenses to have emergency privileges to practice medicine in West Virginia. However, I disagree that healthcare providers who are retired or hold inactive licenses to start practicing.

There are healthcare providers that allowed their licenses to lapse because of underlying/ hidden issues and were aware that through investigations, it would have revealed skeletons.

Moreover, if a retired healthcare provider starts practicing again, there is a lapse in clinical knowledge and skills. This lack can be dangerous for patient care.

Therefore, I recommend that only licensed healthcare providers who hold active licenses and are currently practicing medicine or within the last 12 months be allowed to have emergency privileges to practice medicine.

Sincerely,

Francis K. Le, MD
Interventional Cardiologist
Clinical Cardiac Electrophysiologist
704-299-9658

Frame, Jamie C

Subject: FW: Comment Period Underway for Proposed Board of Medicine Rule

From: Brick, John <jfbrick@hsc.wvu.edu>
Sent: Thursday, April 23, 2020 11:58 PM
To: WV BOM <wvbom@wv.gov>
Subject: Re: Comment Period Underway for Proposed Board of Medicine Rule

The rule looks fine to me.

Sent With My Coal Powered I Phone

On Apr 23, 2020, at 1:59 PM, "wvbom@wv.gov" <wvbom@wv.gov> wrote:

April 23, 2020

The West Virginia Board of Medicine is accepting written comments on proposed rule 11 CSR 14, *Registration to Practice During Declared State of Emergency*. This rule, which is also being promulgated as an emergency rule, creates an emergency registration process to allow physicians and physician assistants licensed in another state, and eligible physicians and physician assistants who currently hold either an inactive or expired status West Virginia license, to provide medical care in West Virginia under special provisions during a declared State of Emergency. The [proposed rule](#) is available for review and comment.

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West Virginia Board of Medicine
101 Dee Drive, Suite 103
Charleston, West Virginia 25311
Mark.A.Spangler@wv.gov

Frame, Jamie C

Subject: FW: Comment Period Underway for Proposed Board of Medicine Rule

From: Abbas, Ghulam <ghulam.abbas@hsc.wvu.edu>
Sent: Friday, April 24, 2020 11:30 AM
To: Spangler, Mark A <Mark.A.Spangler@wv.gov>
Subject: Re: Comment Period Underway for Proposed Board of Medicine Rule

Dear Mr Spangler:

Thank you very much for the opportunity to submit comment on the proposed rule 11 CSR 14, *Registration to Practice During Declared State of Emergency*.
I am in full support of this proposed rule but would like to add another category.

- I recommend all physician with valid limited license should be allowed to practice anywhere in the state too.

Thanks
Ghulam

Ghulam Abbas, MD MHCM FACS

Chief, Division of Thoracic & Esophageal Surgery

Professor, Dept of Cardiovascular & Thoracic Surgery

Surgical Director, Thoracic Oncology WVU Cancer Institute

WVU School of Medicine

1 Medical Center Drive

Morgantown, WV 26506

office: 304-598-6091

Cell: 412-370-7284

From: Ghulam Abbas <gha346@mail.harvard.edu>
Sent: Thursday, April 23, 2020 6:25 PM
To: Abbas, Ghulam <ghulam.abbas@hsc.wvu.edu>
Subject: Fwd: Comment Period Underway for Proposed Board of Medicine Rule

----- Forwarded message -----

From: <wvbom@wv.gov>

Date: Thu, Apr 23, 2020 at 1:56 PM

Subject: Comment Period Underway for Proposed Board of Medicine Rule

To: <GHA346@mail.harvard.edu>

April 23, 2020

The West Virginia Board of Medicine is accepting written comments on proposed rule 11 CSR 14, *Registration to Practice During Declared State of Emergency*. This rule, which is also being promulgated as an emergency rule, creates an emergency registration process to allow physicians and physician assistants licensed in another state, and eligible physicians and physician assistants who currently hold either an inactive or expired status West Virginia license, to provide medical care in West Virginia under special provisions during a declared State of Emergency. The proposed rule is available for review and comment.

All comments must be received by 4:30 pm on May 23, 2020, and should be submitted to:

Mark A. Spangler, Executive Director
West Virginia Board of Medicine
101 Dee Drive, Suite 103
Charleston, West Virginia 25311
Mark.A.Spangler@wv.gov

Frame, Jamie C

Subject: FW: [External] Proposed rule 11 CSR 14, Registration to Practice During Declared State of Emergency

From: Jeremiah Hayanga <jhayanga@me.com>

Sent: Saturday, April 25, 2020 10:22 PM

To: Spangler, Mark A <Mark.A.Spangler@wv.gov>

Subject: [External] Proposed rule 11 CSR 14, Registration to Practice During Declared State of Emergency

CAUTION: External email. Do not click links or open attachments unless you verify sender.

Dear Mr Spangler,

Thank you for all you do for the state.

This is an excellent idea to increase the number of providers in the state. It may likely also be of pragmatic utility, even after the pandemic, to allow providers who are licensed and in good standing in neighboring states to be granted WV licensure by allowing reciprocity even where the 10-year rule is not fulfilled.

Respectfully,

Jeremiah

J. W. Awori Hayanga MD MPH FACS

Frame, Jamie C

Subject: FW: Comment Period Underway for Proposed Board of Medicine Rule

From: saghirmd@aol.com <saghirmd@aol.com>
Sent: Wednesday, April 29, 2020 3:23 PM
To: WV BOM <wvbom@wv.gov>
Subject: Re: Comment Period Underway for Proposed Board of Medicine Rule

WHAT ABOUT CME HOURS being effected due to pandemic , to renew licence?

-----Original Message-----

To: saghirmd@aol.com
Sent: Thu, Apr 23, 2020 2:08 pm
Subject: Comment Period Underway for Proposed Board of Medicine Rule

April 23, 2020

The West Virginia Board of Medicine is accepting written comments on proposed rule 11 CSR 14, *Registration to Practice During Declared State of Emergency*. This rule, which is also being promulgated as an emergency rule, creates an emergency registration process to allow physicians and physician assistants licensed in another state, and eligible physicians and physician assistants who currently hold either an inactive or expired status West Virginia license, to provide medical care in West Virginia under special provisions during a declared State of Emergency. The proposed rule is available for review and comment.

All comments must be received by 4:30 pm on May 23, 2020, and should be submitted to:

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