



State of West Virginia *Board of Medicine*

KISHORE K. CHALLA, MD, FACC
PRESIDENT

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SECRETARY

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KIRAN R. PATEL, MD, FACOG
VICE PRESIDENT

MARK A. SPANGLER, MA, CMBE
EXECUTIVE DIRECTOR

SUMMARY OF COMMENTS RECEIVED REGARDING PROPOSED AMENDMENTS TO 11 CSR 6 AND THE RESPONSE OF THE WEST VIRGINIA BOARD OF MEDICINE

On June 30, 2026, the West Virginia Board of Medicine filed a Notice of Comment Period on a Proposed Rule, 11 CSR 6. Series 6 is the Board's rule which sets forth the continuing education requirements for physicians and podiatric physicians. The Notice established a thirty-day comment period on the proposed rule, which concluded at 4:30 pm on July 30, 2026. During the comment period, the Board received five comments.¹ The Board has reviewed the comments received, and on July 31, 2026, the following response was authorized by the Board. A copy of this summary is being provided to the commenters.

Commenter	Date Comment was Received	Comment	Board of Medicine Response
William Douglas Given, MD	July 9, 2026	"I really am failing to see what requiring nutrition education is going to address with physicians. I would hope that positions and learn something about nutrition in med school. I think adding some more requirements on the licensing in West Virginia is really not that worthwhile an idea. I have practiced here in West Virginia for 42 years serving people my local community."	The Board appreciates Dr. Given's many years of service to the citizens of West Virginia and for taking the time to comment on the proposed amendments to the rule. The Board has not modified the proposed rule as a result of this comment.

¹ A copy of the comments received by the Board and the Board's response thereto is attached to this summary.

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John F. DiStefano, MD	July 9, 2026	“The nutritional issues in West Virginia are related to poverty and poor education. Physicians cannot impact those issues.”	The Board appreciates Dr. DiStefano taking the time to comment on the proposed amendments to the rule. The Board has not modified the proposed rule as a result of this comment.
Frank Joseph Collins, MD	July 9, 2026	“The current micro-management of physician continuing education is neither helpful nor practical. These mandates appear to serve more as a political posturing than as useful professional oversight. While the epidemic of obesity is a well-known issue, the solution lies in ensuring proper nutritional education for citizens within the public education system. I urge the Board to stop imposing these unnecessary mandates on licensed professionals, which are redundant and impractical.”	The Board appreciates Dr. Collins taking the time to comment on the proposed amendments to the rule. The Board has not modified the proposed rule as a result of this comment.
Deborah Klimek, MD	July 13, 2026	“I am writing to comment on the amendment requiring 2 hours of continuing medical education on nutrition for physicians. As a physician I am certainly interested in proper nutritional choices for my patients, my family, and myself. However adding additional broad requirements to physician licensing seems onerous. We all have specialty specific board	The Board appreciates Dr. Klimek taking the time to comment on the proposed amendments to the rule. The Board cannot opine on future CME requirements, as those requirements are based on legislation that is passed. The Board has not modified the proposed rule as a result of this comment.

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		certification requirements as well. Next year will we have new state requirements on the importance of exercise, smoking cessation, and abstinence from drugs and alcohol? These are topics in which all physicians are well versed. I am not sure that anything can be done to reverse this since I understand I should have voiced my dissent before this bill was passed. It wasn't the most pressing one I was aware of during the legislative session involving health care. I appreciate your patience in reading my comment. Thank you for your time."	
Francis Joseph Morrison, MD	July 9, 2026	"Am fully licensed in 46 states and DC. For all the supposed concern over physician burnout, suicide, opioid epidemic, human trafficking, Child abuse, etc., then the mandated CME required of the same providers to increase their stress more, I wish state legislators could cease passing CME laws to prove to their constituents how much they care and how little their state providers know. Now "Nutrition CME" is on the plate??!! Digesting this summary itself is tiresome. I hope I understand that if the ABFM certifies one as	The Board appreciates Dr. Morrison taking the time to comment on the proposed amendments to the rule. As provided in the proposed rule, nutrition CME must be completed in addition to other CME requirements. Board certification, recertification or maintenance of certification do not exempt physicians from completing nutrition CME. The Board has not modified the proposed rule as a result of this comment.

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		board certified it can suffice for all the nuanced and niche topics we need to renew our licenses. States also require annual, biennial fees from 0 to over a \$1000 per year. It is overreach, overkill, disparate from state to state and exasperating. I am against this. At most, if being board certified isn't enough, then those NOT prescribing controlled substances, nutrition prescribing, etc. should be exempt. At least, if there is a ONE time course (NOT repeated year after year) or if one course was taken for a state, it should universally satisfy any other state. Legislate some uniformity and common denominator for us so we can spend our time on important things like with patients and not endless topics.”	
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Conclusion

The Board expresses its appreciation to the physicians for their comments regarding the proposed amendments to the rule. The Board understands and appreciates the concerns regarding the impact of educational mandates on physicians; however, the proposed amendments are a direct result of legislation that was enacted during the 2026 session of the West Virginia Legislature.

The Board has made no modifications to the proposed rule based upon the comments received.



Frame, Jamie C <jamie.c.frame@wv.gov>

Fwd: New CME requirements by the West Virginia Board of medicine

1 message

Frame, Jamie C <jamie.c.frame@wv.gov>
To: Jamie C Frame <jamie.c.frame@wv.gov>

Fri, Jul 31, 2026 at 11:22 AM

From: **William Given** <doug1g@msn.com>
Date: Thu, Jul 9, 2026 at 3:34 PM
Subject: New CME requirements by the West Virginia Board of medicine
To: Mark.A.Spangler@wv.gov <Mark.A.Spangler@wv.gov>

Dear Mr. Spangler,

I really am failing to see what requiring nutrition education is going to address with physicians. I would hope that positions and learn something about nutrition in med school. I think adding some more requirements on the licensing in West Virginia is really not that worthwhile an idea. I have practice here in West Virginia for 42 years serving people my local community.

Sincerely, years,
Doug Given MD



State of West Virginia *Board of Medicine*

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MARK A. SPANGLER, MA, CMBE
EXECUTIVE DIRECTOR

July 31, 2026

VIA EMAIL ONLY

William Douglas Given, MD
Doug1g@msn.com

Re: Proposed Amendments to West Virginia Board of Medicine Rule 11 CSR 6

Dear Dr. Given:

Thank you for taking the time to review and comment on the Board's proposed amendments to the Board's rule 11 CSR 6, *Continuing Education for Physicians and Podiatric Physicians*.

The Legislative Committee of the Board met today, July 31, 2026, to review and consider all of the comments that were received. No modifications were made to the proposed rule in response to the comments it received. Enclosed please find the Board's *Summary of Comments Received Regarding Proposed Amendments to 11 CSR 6 and Response of the West Virginia Board of Medicine* (without attachments).

The agency-approved version of 11 CSR 6 will be filed with the West Virginia Secretary of State's Office today and will be available for review on their website at <https://apps.sos.wv.gov/adlaw/csr/>. The enclosed summary, along with all comments, will also be available on the Secretary of State's website.

Thank you again for your participation in the rulemaking process and for your comments.

Sincerely,

Mark A. Spangler

MAS/jcf
Enclosure



Frame, Jamie C <jamie.c.frame@wv.gov>

Fwd: Nutritional Education

1 message

Frame, Jamie C <jamie.c.frame@wv.gov>
To: Jamie C Frame <jamie.c.frame@wv.gov>

Fri, Jul 31, 2026 at 11:18 AM

From: **John DiStefano** <witsendalso@gmail.com>
Date: Thu, Jul 9, 2026 at 4:49 PM
Subject: Nutritional Education
To: <Mark.A.Spangler@wv.gov>

The nutritional issues in West Virginia are related to poverty and poor education.
Physicians cannot impact those issues.



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EXECUTIVE DIRECTOR

July 31, 2026

VIA EMAIL ONLY

John F. DiStefano, MD
witsendalso@gmail.com

Re: Proposed Amendments to West Virginia Board of Medicine Rule 11 CSR 6

Dear Dr. DiStefano:

Thank you for taking the time to review and comment on the Board's proposed amendments to the Board's rule 11 CSR 6, *Continuing Education for Physicians and Podiatric Physicians*.

The Legislative Committee of the Board met today, July 31, 2026, to review and consider all of the comments that were received. No modifications were made to the proposed rule in response to the comments it received. Enclosed please find the Board's *Summary of Comments Received Regarding Proposed Amendments to 11 CSR 6 and Response of the West Virginia Board of Medicine* (without attachments).

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Thank you again for your participation in the rulemaking process and for your comments.

Sincerely,

Mark A. Spangler

MAS/jcf
Enclosure



Frame, Jamie C <jamie.c.frame@wv.gov>

Fwd: Comment Period Underway for Board of Medicine Rules

1 message

Frame, Jamie C <jamie.c.frame@wv.gov>
To: Jamie C Frame <jamie.c.frame@wv.gov>

Fri, Jul 31, 2026 at 11:18 AM

From: Frank Collins <f.collins1963@gmail.com>
Date: Thu, Jul 9, 2026 at 3:01 PM
Subject: Re: Comment Period Underway for Board of Medicine Rules
To: <wvbom@wv.gov>

Dear Mr. Spangler,

I am writing to submit formal comments regarding the proposed amendments to 11 CSR 6, Continuing Education for Physicians and Podiatric Physicians.

The current micro-management of physician continuing education is neither helpful nor practical. These mandates appear to serve more as political posturing than as useful professional oversight.

While the epidemic of obesity is a well-known issue, the solution lies in ensuring proper nutritional education for citizens within the public education system. I urge the Board to stop imposing these unnecessary mandates on licensed professionals, which are redundant and impractical.

Sincerely,

Frank Collins

On Thu, Jul 9, 2026, 2:47 PM <wvbom@wv.gov> wrote:

July 9, 2026

Due to legislation enacted during the 2026 session of the West Virginia Legislature, the West Virginia Board of Medicine is currently accepting written comments on a proposed new rule, proposed amendments to three existing rules and the proposed repeal of two rules. To view the proposed rules, please click on the corresponding link below.

Rule Title

Deadline to Submit Written Comments

PROPOSED NEW RULE

[11 CSR 18, Emeritus Status Licensure for Retired Providers](#)

12:00 pm EDT
on July 30, 2026

PROPOSED AMENDMENTS TO EXISTING RULES

[11 CSR 6, Continuing Education for Physicians and Podiatric Physicians](#)

12:00 pm EDT
on July 30, 2026

11 CSR 7, Formation and Approval of Professional
Limited Liability Companies

12:00 pm EDT
on July 30, 2026

11 CSR 1A, Licensing of Physicians and Podiatric
Physicians and Disciplinary Procedures for
Applicants, Licensees, Credential Holders.

8:30 am EDT
on July 31, 2026

PROPOSED RULES FOR REPEAL

11 CSR 9, Certification, Disciplinary and Complaint
Procedures, Continuing Education, Radiologist
Assistants

12:00 pm EDT
on July 30, 2026

11 CSR 11, Establishment and Regulation of
Limited License to Practice at Certain State
Veterans Nursing Home Facilities

12:00 pm EDT
on July 30, 2026

Written Comments 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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July 31, 2026

VIA EMAIL ONLY

Frank Joseph Collins, MD
f.collins1963@gmail.com

Re: Proposed Amendments to West Virginia Board of Medicine Rule 11 CSR 6

Dear Dr. Collins:

Thank you for taking the time to review and comment on the Board's proposed amendments to the Board's rule 11 CSR 6, *Continuing Education for Physicians and Podiatric Physicians*.

The Legislative Committee of the Board met today, July 31, 2026, to review and consider all of the comments that were received. No modifications were made to the proposed rule in response to the comments it received. Enclosed please find the Board's *Summary of Comments Received Regarding Proposed Amendments to 11 CSR 6 and Response of the West Virginia Board of Medicine* (without attachments).

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Thank you again for your participation in the rulemaking process and for your comments.

Sincerely,

Mark A. Spangler

MAS/jcf
Enclosure



Frame, Jamie C <jamie.c.frame@wv.gov>

Fwd: W. Va. Code §§ 30-1-7a & 30-3-7. C HB4951

1 message

Frame, Jamie C <jamie.c.frame@wv.gov>
To: Jamie C Frame <jamie.c.frame@wv.gov>

Fri, Jul 31, 2026 at 11:17 AM

From: **Klimek, Deborah** <klimek@marshall.edu>
Date: Mon, Jul 13, 2026 at 8:06 AM
Subject: W. Va. Code §§ 30-1-7a & 30-3-7. C HB4951
To: Mark.A.Spangler@wv.gov <Mark.A.Spangler@wv.gov>

Dear Mr. Spangler,

I am writing to comment on the amendment requiring 2 hours of continuing medical education on nutrition for physicians. As a physician I am certainly interested in proper nutritional choices for my patients, my family, and myself. However adding additional broad requirements to physician licensing seems onerous. We all have specialty specific board certification requirements as well. Next year will we have new state requirements on the importance of exercise, smoking cessation, and abstinence from drugs and alcohol? These are topics in which all physicians are well versed.

I am not sure that anything can be done to reverse this since I understand I should have voiced my dissent before this bill was passed. It wasn't the most pressing one I was aware of during the legislative session involving health care.

I appreciate your patience in reading my comment. Thank you for your time.

Sincerely,
Deborah Klimek, MD
Pediatric Ophthalmologist



State of West Virginia *Board of Medicine*

101 Dee Drive, Suite 103
Charleston, WV 25311
Telephone (304) 558-2921
Fax (304) 558-2084
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July 31, 2026

VIA EMAIL ONLY

Deborah Lynn Klimek, MD
klimek@marshall.edu

Re: Proposed Amendments to West Virginia Board of Medicine Rule 11 CSR 6

Dear Dr. Klimek:

Thank you for taking the time to review and comment on the Board's proposed amendments to the Board's rule 11 CSR 6, *Continuing Education for Physicians and Podiatric Physicians*.

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Mark A. Spangler

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Enclosure



Frame, Jamie C <jamie.c.frame@wv.gov>

Fwd: Comment Period Underway for Board of Medicine Rules

1 message

Frame, Jamie C <jamie.c.frame@wv.gov>
To: Jamie C Frame <jamie.c.frame@wv.gov>

Fri, Jul 31, 2026 at 11:17 AM

From: Francis Morrison <fjm545454@gmail.com>
Date: Thu, Jul 9, 2026 at 6:37 PM
Subject: Re: Comment Period Underway for Board of Medicine Rules
To: <wvbom@wv.gov>

Am fully licensed in 46 states and DC.

For all the supposed concern over physician burnout, suicide, opioid epidemic, human trafficking, Child abuse, etc., then the mandated CME required of the same providers to increase their stress more, I wish state legislators could cease passing CME laws to prove to their constituents how much they care and how little their state providers know. Now "Nutrition CME" is on the plate??!!

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I am against this. At most, if being board certified isn't enough, then those NOT prescribing controlled substances, nutrition prescribing, etc. should be exempt. At least, if there is a ONE time course (NOT repeated year after year) or if one course was taken for a state, it should universally satisfy any other state. Legislate some uniformity and common denominator for us so we can spend our time on important things like with patients and not endless topics.

Thank you.
Francis Joseph Morrison MD
#31346
fjm545454@gmail.com.
(936) 232-3417

On Thu, Jul 9, 2026 at 2:05 PM <wvbom@wv.gov> wrote:

July 9, 2026

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Physicians and Disciplinary Procedures for
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8:30 am EDT
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July 31, 2026

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Francis Joseph Morrison, MD
fjm545454@gmail.com

Re: Proposed Amendments to West Virginia Board of Medicine Rule 11 CSR 6

Dear Dr. Morrison:

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Thank you again for your participation in the rulemaking process and for your comments.

Sincerely,

Mark A. Spangler

MAS/jcf
Enclosure