



August 7, 2023

**Kimberly Anderson, Chief Legal Officer**

Ohio State Medical Board  
30 East Broad Street, 3<sup>rd</sup> Floor  
Columbus, OH 43215

Sent via Email to Medical Board at: [Kimberly.Anderson@med.ohio.gov](mailto:Kimberly.Anderson@med.ohio.gov)

**RE: Proposed Rules 4731-15, 4731-16, 4731-28**

Dear Ms. Anderson,

Thank you for the opportunity to comment on Rules 4731-15 (Reporting Requirements), 4731-16 (Impaired Practitioners), and 4731-28 (Mental or Physical Impairment).

The Academy of Medicine of Cleveland & Northern Ohio (AMCNO), founded in 1824, is the region's professional medical association and the oldest professional association in Ohio. We are a non-profit 501(c)6 representing over 6,700 physicians and medical students from all the contiguous counties in Northern Ohio. We are proud to be the stewards of Cleveland's medical community of the past, present, and future.

The mission of the AMCNO is to support physicians in being strong advocates for all patients and to promote the practice of the highest quality of medicine. With that in mind, we offer the following comments.

We applaud the proposed changes to these rules. Specifically, we see the adjustment from the one-bite program to a confidential monitoring program as beneficial for practitioners who may not feel personally well enough to see and treat patients. Allowing more flexibility around individuals' specific circumstances related to mental impairment, physical impairment, and overdose may allow for a more empathy-centered approach toward our providers who are experiencing additional strain in the workplace.

According to the National Institute for Health Care Management Foundation, around 71% of physicians reported exhaustion and burnout in 2020, up from an estimated 29%- 54% of health care workers in 2019. The COVID-19 pandemic has highlighted the critical need to reduce the stigma physicians encounter when seeking help and increase their access to mental health services<sup>1</sup>. We are encouraged to see resources becoming more available to physicians who need help during this difficult and personally demanding period of medical practice.

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<sup>1</sup> <https://nihcm.org/publications/its-ok-not-to-be-ok-physician-burnout-and-mental-health#:~:text=Around%2071%25%20of%20physicians%20reported%20exhaustion%20and%20burnout,increase%20their%20access%20to%20mental%20health%20health%20services.>

Additionally, as a founding partner of the Ohio Professionals Health Program (OPHP), we are pleased to have them as a part of this evaluation and treatment process. We believe that they are an appropriate body to act in the best interest of both providers and their patients.

Thank you for your continued efforts to advocate in the best interest of Ohio's physicians.

Sincerely,

A handwritten signature in black ink that reads "Jen Johns". The signature is written in a cursive, flowing style.

Jen Johns, MPH  
AMCNO Executive Director