

BROOKVILLE

PEDIATRIC & INTERNAL MEDICINE, PC.

To Whom It May Concern:

This letter is in response to the disaffiliation letter dated January 19, 2017. This letter was not received by my office and was finally received via fax yesterday, February 28, 2017. As such, my request for an appeal is beyond the 30 day window, but I trust you will still consider this appeal.

I would ask that the panel take into consideration the following information:

- 1.) I have successfully and easily passed two American Board of Pediatric examinations in 2003 and 2013.
- 2.) Since 2010, I have successfully completed two cycles of American Board of Pediatrics "Maintenance of Certification", which involved 40+ points of "Practice Improvement Modules" involving 3 research projects on my patients and submitting that data to the American Board of Pediatrics, as well as 60+ points of Part 2 " Lifelong Learning and Self-Assessment". This is in addition to the 150 hours of CME I complete every three years to have an active license in the state of Michigan.
- 3.) The only reason I am not "board certified" through the American Board of Pediatrics is because of money. After fulfilling all my testing and all my educational commitments in 2015, the ABP demanded \$1500 or else they would strip me of board certification. It is this excessive fee I am objecting to. I already paid \$2,000 for a board examination in 2003, at the time it was supposed to be valid until 2013. In 2010, they made me pay \$1050 to enroll in MOC. Then in 2015 they wanted another \$1500. This is ridiculous, and when tied to our livelihood via hospital privileges and insurance participation, becomes pretty dang close to extortion.
- 4.) If I pay \$1500 to the American Board of Pediatrics (a 501c3 in North Carolina) today, I will immediately become board certified. There are no more tests due for another 10 years. BCBSM is asking me to pay \$1500 to a non-profit in North Carolina in order to be credentialed in Michigan, and I find this astonishing. MOC is discriminatory credential, as "grandfathered" pediatricians are not required to take any additional tests, let alone pay additional fees. MOC is a discriminatory credential as there is great variation in cost and time between specialties.
- 5.) I am not alone in this thinking. Michigan State Medical Society has held active policy opposing the use of board certification and MOC as a credential for insurance participation for 19 years. The American Medical Association also holds very strong language opposing the discrimination of physicians based upon MOC. The AMA updated this language most recently in November 2016 and they are actively negotiating with insurers nationally. In addition, there is active legislation in the Michigan Legislature,(HB4135) that would make this type of MOC requirement for insurance credentialing illegal in Michigan. This type of legislation has passed in Oklahoma, and has been introduced in multiple states this year.

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As I have clearly demonstrated my intellectual capability as a pediatrician by fulfilling every single academic and testing requirement of the Michigan Board of Medicine as well as the American Board of Pediatrics, I ask that my disaffiliation with BCBSM be reversed. The only reason I am not currently board certified through the ABP is due to my objection with the excessive, arbitrary, never-ending, and discriminatory fees placed upon younger physicians, not due to academic requirements.

I am currently board certified through the National Board of Physicians and Surgeons, an alternate board created by the top physicians in our field, as a competing entity to the monopoly created by the American Board of Medical Specialties. Allowance of this alternate board, which also uses primary source verification of initial ABMS certification should be something BCBSM considers in the future. The NBPAS requirements are not discriminatory, as they are essentially "grandfathering for all".

As per the rights listed in my disaffiliation letter, I would certainly appreciate being present at any hearing that takes place as well as bring legal counsel if needed. Thank you very much for your consideration.

Megan Edison MD

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