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MEMORANDUM

DATE	February 13, 2025
ТО	OMBC Board Members
FROM	Terri Thorfinnson, J.D.
	Administrative Services Program Manager
RE:	Agenda Item 11- Administrative Services Program Update

Overview

Administrative Services Program includes:

- Physician and Surgeon Renewals (including SB 806 enforcement)
- Fictitious Name Permits (initial applications and renewals)
- Enforcement Intake
- Legislation
- Rulemaking

This update will focus on performance measure statistics for renewal and Fictitious Name Permits. Renewals

Physician and Surgeon Renewals

There is no significant change in Physician and Surgeon statistics. Each month varies in the number of renewals received and processed. The processing times remain low and do not vary significantly from month to month as you can in the tables below.

We are beginning to prepare for the implementation phase of the Continuing Medical Education regulations that will usher in self-certification of compliance and self-renewal online followed up by audits. There is a lot of implementation work in creating new systems, templates, and breeze functionality.

Fictitious Name Permits

Since the Fictitious Name Permits (FNP) went online in June 2024, the Board observed longer processing times, increased workload, and a significant increase in deficient applications that could not be cured and thus were denied.

Although it was anticipated that the online application would streamline and reduce the processing workload, it in fact significantly increased processing times and workload. There are several factors that contributed to the increase in staff workload for processing the online FNP applications. First, once the online application was submitted, it had to be processed regardless of whether it was

incomplete or deficient. Additionally, online applications were active for 90 days before they would be cancelled. The 90 days was the reasonable time given to applicants to cure their deficiencies. However, the 90 days significantly increased the Board's processing time because the Board had to wait for the deficient applications to be cured and track the deficiencies.

The second significant factor that contributed to increased processing workload is the online application form itself that seemed to cause deficiencies because applicants were not answering the online questions correctly and consistently which caused their application to be denied. These increased deficiencies related to the online application in turn increased the staff processing workload because staff had more application deficiencies to follow-up on with applicants than with the manual processing system.

These results were counterintuitive: that an online application would generate more workload and increase processing times, but that is what we found to be true. In comparing these results with the processing times and workload for manual applications downloaded from the Board's website and mailed to the Board with a check, the manual process turns out to be much more streamline. The main reason for this is the online application forced deficient applications to be processed by the Board; whereas, with the manual application, only completed, deficiency free applications were processed, and the incomplete or deficient applications were returned to applicants. Another factor is that in comparing the manual application to the online application, the manual application is simple to complete, compared to the online application's format that asks the same question four times and has a screen of answers that includes irrelevant answers that confuse applicants.

The Board met with Breeze staff to discuss issues with the online application, and they confirmed that the issue with the inclusion of answers that were not applicable to the Board cannot be revised. As a result, we requested they remove the online application, and we will resume with processing FNP initial applications manually. We have updated the website and added the downloadable FNP initial application form and updated the links. The FNP online application will be removed the second week in February.

Going forward, applicants will go back to downloading the FNP initial application form and paying by check or money order. The tradeoff is to return to manually processing applications in order to streamline our processing workload and time and reduce the number of applications being denied that are non-refundable; however, we lose the convenience of credit card payment. Manually processing forms and checks received by mail need to be cashiered which adds some processing time. The online application allowed credit card payment which was instantaneously processed compared to manual cashiering which is not instantaneous. An important fact about this tradeoff is the unintended consequence that the credit card payment resulted in the Board receiving more deficient applications that had to be denied because once the payment was made, it required the Board to process and deny deficiencies that they would have otherwise returned and not processed. In returning to the manual processing, the Board will streamline its processing, reduce its performance time, and reduce the workload related to applications with deficiencies.

Removing the initial FNP application from online does not impact the FNP renewals that are available online. We will continue to utilize Breeze to streamline FNP renewals and leverage the convenience of online credit card payments.

Physician and Surgeon Renewals October 1, 2024, through December 31, 2024

Oct	Oct	Nov	Nov	Dec	Dec	Total	Total
received	approved	received	approved	received	approved	received	approved
657	537	541	439	1,309	615	2,507	1,871

Physician and Surgeon Renewal Processing Time October 1, 2024, through December 31, 2024

October 2024	November 2024	December 2024	Average Processing Time
19 days	26 days	22 days	23 days

Fictitious Name Permits Processing Time October 1, 2024, through December 31, 2024

FNP	Total Applications Processed	Complete applications	Processing time
Initial Applications	59	29	57 days
Renewals	851	No data	6 days