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## Re: Concerns Regarding the Unlicensed Practice of “Manual Osteopathy” in the United States

To Whom It May Concern:

On behalf of the American Osteopathic Association (AOA), which represents over 207,000 osteopathic physicians (DOs) and osteopathic medical students (OMSs) nationwide, we write today to bring to your attention an alarming patient safety issue: the domestic emergence of the unlicensed, unregulated practice of “manual osteopathy” by individuals who completed training outside of the United States (US), primarily in countries that also lack standardized education and regulatory pathways. These individuals are exploiting statutory loopholes and misleading patients, who may believe that they are seeing a fully trained and licensed DO or medical doctor (MD) with osteopathic training, which are the only types of healthcare providers who are licensed to provide osteopathic manipulative treatment (OMT) in the US. Aside from reputational harm; however, the manual manipulation procedures performed by these individuals carry significant risks for patients – including vertebral artery dissections and stroke<sup>1</sup>. Therefore, it is critical that we work together to close legislative and regulatory loopholes that allow these individuals to practice, and educate the public so that they can make informed decisions about who is providing their healthcare.

The osteopathic medical model is unique to the US and differs significantly from the practice of “manual osteopathy” as it exists in other parts of the world. The US model dates back to 1874 when frontier doctor Andrew Taylor Still founded a philosophy of medicine based on the idea that the body has an innate ability to heal itself, and the musculoskeletal system is a key element of health. Dr. Still founded the first osteopathic medical school in 1892 in Kirksville, Missouri based upon these principles, and today, there are 44 colleges of osteopathic medicine (COMs) which offer instruction at 71 teaching locations across the US. All COMs are accredited by the Commission on Osteopathic College Accreditation, which is recognized by the US Department of Education (DoEd) for this purpose, equivalently to the Liaison Committee on Medical Education (LCME) for the accreditation of US MD schools. Today, DOs represent nearly 1 in 5 US physicians and 1 in 4 medical students nationwide<sup>2</sup>. They practice in every medical field and specialty available, combining their expertise with a whole-person approach centered on listening to and partnering with patients.

All US physicians (DOs and MDs) complete:

- Four years of medical school, comprised of two years of didactic study followed by two years of clinical rotations done in community hospitals, major medical centers, and doctors’ offices;
  - *Additionally*, DOs complete over 200 hours of training in osteopathic principles and practice during medical school, which enables them to safely treat patients using OMT, in addition to options such as medication or surgery;

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<sup>1</sup> <https://www.sciencedirect.com/science/article/abs/pii/S030384672100192X>

<sup>2</sup> <https://osteopathic.org/index.php?aam-media=/wp-content/uploads/2024-OMP-Report.pdf>

- 12,000 – 16,000 hours of supervised postgraduate education (residency) over the course of three to seven years to develop advanced knowledge and clinical skills relating to a wide variety of conditions;
- A comprehensive, three-part medical licensing examination series (either the Comprehensive Osteopathic Medical Licensing Examination, which specifically tests fitness for osteopathic medical practice, or the US Medical Licensing Examination). Both examinations are recognized and accepted by all US state medical licensing boards;
- Certifying board exams, either through the American Board of Medical Specialties (ABMS) or the AOA Bureau of Osteopathic Specialists; and
- Completion of continuing medical education hours throughout the tenure of their practice.

Outside of the US, practitioners of “osteopathy” do not attend medical school or practice medicine, and instead focus on hands-on treatment, typically for musculoskeletal conditions. Although some countries do regulate “manual osteopathy,” *the majority of countries* (including the US), do not. Lack of public awareness about differences in osteopathic training and practice globally – along with the existence of legal and regulatory “grey areas” – have begun to encourage the growth of unaccredited, low-quality “schools of manual osteopathy” in recent years. These for-profit schools lure prospective students with promises of lucrative careers in “osteopathy” around the world – including in the US, and their graduates have set up practices here, despite the fact that the poor quality “education” that they offer falls far below any recognized standards for patient safety.

Operators of these “schools” engage in numerous practices designed to present the veneer of legitimacy, including utilizing corporate registrations and trademarks to imply that their programs are accredited by the proper authorities, and creating illegitimate or fictitious professional associations and “accrediting/credentialing” bodies with similar names to legitimate government bodies (i.e. the fictitious “US Department of States *[plural]*”, vs. the legitimate US Department of State *[singular]*). These schools typically operate online or outside of the US to make deterrence difficult, but they advertise campuses, training and/or career opportunities in the US, as well as in other countries. Substandard operators also exploit loopholes in healthcare title protection, truth in advertising, and professional licensing schemes to entice prospective enrollees with claims of lucrative job opportunities in the US following accelerated (mostly online) training, and, unfortunately, their “graduates” are currently practicing in some states, without licensure or regulatory oversight that helps to protect patients. Some have even begun partnering with associations that attempt to utilize first amendment religious freedom arguments as a way to evade state-based licensure requirements that they would otherwise be unable to meet<sup>3</sup>.

Unlicensed “manual osteopaths” in the US take advantage of a crowded healthcare field and patient confusion about practitioner titles, and many patients may believe that they are seeing a highly trained and licensed osteopathic physician – or, at a minimum, another healthcare provider who completes standardized training and licensure requirements – when they are not. These unlicensed practitioners are co-opting the reputation of DOs and the protections that exist for their patients, which places them in a vulnerable position should a bad outcome occur.

Further, “manual osteopaths” are practicing medicine without a license, by diagnosing patients and implementing treatment plans designed to target a wide variety of medical conditions. Spinal manipulation techniques, including OMT, can be dangerous for patients if improperly

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<sup>3</sup> See <https://gehassociation.org/>

applied, and the absence of regulation for these individuals makes disciplining, tracking and preventing future harm extremely difficult. In rural areas, where access to quality, affordable healthcare is lacking, patients may be particularly vulnerable to the claims of “manual osteopaths.”

The AOA strongly urges you to investigate individuals claiming to practice “osteopathy” without a medical license in your jurisdiction, and to strengthen truth in advertising and title protections for DOs, as well as require all healthcare providers to prominently display and affirmatively communicate their credentials to patients. Further, we encourage you to investigate and, where appropriate, take action against misleading advertisements made by operators of osteopathic “schools” and “training programs” in the US.

Thank you for your consideration and for your commitment to the health and safety of patients. The AOA and our members stand ready to assist you in your endeavors. Should you have any questions or if we can be a resource, please contact Raine Richards, JD, AOA Vice President of State and International Affairs at [r-richards@osteopathic.org](mailto:r-richards@osteopathic.org).

Sincerely,



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