



Florida Society of Physical Medicine & Rehabilitation

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Board of County Commissioners
Seminole County Services Building
1101 E. First Street
Sanford, FL 32771

Attn: A. Bryant Applegate, Esq.
County Attorney

Dear Commissioners,

On behalf of the Florida Society of Physical Medicine & Rehabilitation (FSPM&R), we respectfully express our opposition to the current proposed pain clinic ordinance as currently written. We agree with other medical organizations, in that several points of the proposed ordinance bring unintended potential harm to the patients and good physicians in your County. We agree with and support the County's intent to protect their citizens and community from the health hazards and societal effects of Florida pill mills, but this should not be a detriment to the health of honest patients and physician's practices. With that in mind, do note that we share the same goals and are committed to support any endeavors that will protect and enhance the healthcare of all Floridians.

The proposed ordinance's expanded definition of pain management clinics will encompass almost all physician specialties outside from existing chronic pain medicine clinics. It includes but is not limited to cardiologists, primary care specialties, internists, occupational medicine, pediatricians, gastroenterologists, surgeons, rheumatologists, physiatrists, dentists, oral surgeons, and palliative end of life care physicians. All these fields encompass patients with pain and may advertise for such conditions like joint pain, chest pain, abdominal pain, etc.

Zoning restrictions for legitimate pain management clinics will effectively hinder the community's access to good care. Legitimate physician practices should be near the rest of the medical community and available hospitals in which they serve; this would improve care and also further guard the community from pill mills. Imagine having ones grandparents with arthritis, a mother with end stage non-cancerous renal disease, or a father or other family member with other ailments needing to travel to a commercial/industrialized zone area for legitimate medical care at a legitimate medical pain practice clinic.

In summary, we recommend and hope that the Seminole County commissioners will consider revising the current ordinance to align with current state and federal laws and work in concert with the community physicians and medical societies in this matter.

Sincerely,

Rigoberto Puente-Guzman, MD
FSPM&R President