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American Academy of Sleep Medicine

May 26, 2015

Dr. Lee Berkowitz, ABIM Council Chair American Board of Internal Medicine 510 Walnut Street Suite 1700 Philadelphia PA 19106-3699 SENT BY EMAIL TO: Ms. Anamika Gavhane - <u>AGavhane@abim.org</u>

Dear Dr. Berkowitz:

On behalf of the board of directors of the American Academy of Sleep Medicine (AASM), I thank the ABIM Council for requesting comments from the AASM regarding potential changes to the current requirements to remain certified in sleep medicine. I appreciate the opportunity to provide the following input for your consideration.

The AASM strongly supports the proposed change that would eliminate the requirement to hold underlying certification in internal medicine or an ABIM subspecialty in order to remain certified in sleep medicine. We have heard from numerous sleep specialists who feel that it is unnecessarily burdensome, and costly, to maintain multiple certifications, especially given the demanding requirements and fees implemented through the ABIM's Maintenance of Certification (MOC) program. We agree that sleep specialists should not be obliged to maintain certification in an area of medicine that does not reflect their clinical practice.

Approval of the ABIM Council's proposed change to the MOC requirements would provide reasonable flexibility that would enable sleep medicine diplomates to maintain only those certifications that are clinically relevant to their practice. The AASM recognizes that some sleep medicine physicians maintain a clinical practice in other areas such as internal medicine, critical care medicine or pulmonary disease, and as such they may choose to maintain multiple certifications. However, the maintenance of underlying certification in internal medicine or an ABIM subspecialty should be a choice made by each individual physician, rather than a mandatory obligation required of all sleep specialists.

The AASM has no concerns with the proposed change, and we recognize that it would not affect the current requirements for initial certification in sleep medicine. The AASM continues to support the required achievement of underlying certification as a pre-requisite for initial sleep medicine certification.

The AASM encourages the ABIM Council to seek additional comments from the other ABMS member boards that are stakeholders in the sleep medicine

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certification examination. We believe that it would be beneficial for these boards to follow the lead of the ABIM Council by making a similar change to their MOC programs.

To discuss this issue in more detail, you may contact AASM Executive Director Jerome Barrett at 630-737-9700. Please keep the AASM updated on the status of this proposal as it is reviewed by the ABIM Council and ABIM board of directors.

Thank you for your ongoing efforts to enhance the quality of health care through physician certification.

Sincerely,

Timothy Morgenthaler, MD President

cc: Jerome Barrett Nathaniel Watson, MD