Dear Drs. Colenda and Scanlon:

The American Academy of Dermatology (AAD) was established in 1938 with the principle objective to provide continuing education for practicing dermatologists. AAD is the largest, most influential and most representative dermatology society in the United States. With a membership of more than 20,000, the AAD represents virtually all practicing dermatologists in the United States, U.S.-based dermatology residents, as well as a growing number of international dermatologists.

AAD leadership has carefully reviewed the draft report released on December 11, 2018 by the Continuing Board Certification: Vision for the Future Commission and appreciate the opportunity to provide comment. We endorse comments generated by the Council of Medical Specialty Societies (CMSS) that have been submitted to the Commission.

We do wish to underscore six important areas that have been addressed by CMSS but that we believe cannot be overstated.

1. Since ABMS has acknowledged that they lack evidence-based data to support continuing certification, we believe that ABMS and ABMS Boards need to be able to demonstrate validity for whatever methods are finally selected to be part of continuing certification. This needs to be demonstrated before implementation.
2. We strongly support the CMSS recommended time out on the use of the secure exam until the ABMS and its member Boards can implement recommended changes to any continuing certification process.
3. Not only should there be a strong emphasis on collaboration between the Boards and Specialty Societies with a focus on the integration of Specialty Societies in the continuing certification but we would like to see a stronger focus on the critical role that
Speciﬁcity Societies play in education and the provision of vital programs/products that not only assist diplomates in identifying practice gaps but also provide them with resources to improve their practices (registries, peer comparison, quality improvement programs, establishment of clinical guidelines, etc.).

4. The Commission Report focuses on additional areas for assessment (“…advances in medicine and initiatives to improve care, patient safety and improved diagnosis, assessment of procedural and surgical skills using simulation and new assessment technologies that can be readily aligned with the daily routine of clinical practice in order to minimize physician burden”). This section is remarkably vague. If the Commission has speciﬁc ideas on how this can be accomplished while at the same time minimizing physician burden as well as minimizing intrusion into the physician’s clinical practice, those ideas should be clearly delineated in this report. Further, data should be provided that demonstrates evidence that the methods/techniques are indeed valid and positively impact clinical practice.

5. The importance of the recommendation in the Commission report focused on ﬁnancial transparency and accountability for all ABMS Boards must be stressed. This is a concern that is frequently expressed by diplomates and we strongly encourage implementation of this going forward.

6. Finally, it is imperative that ABMS and its specialty Boards educate the public and other stakeholders on the meaning and the value of the certiﬁcation they issue.

Thank you again for the opportunity to provide comment on this important document. We look forward to further engagement on this topic.

Sincerely,

Suzanne Olbricht, MD, FAAD
President