



Leading Change. Improving Care for Older Adults.

THE AMERICAN GERIATRICS SOCIETY

40 FULTON STREET, SUITE 809

NEW YORK, NEW YORK 10038

212.308.1414 TEL

www.americangeriatrics.org

May 31, 2024

Richard G. Battaglia, MD, FACP
Chief Medical Officer
American Board of Internal Medicine
510 Walnut Street
Suite 1700
Philadelphia, PA 19106

Dear Dr. Battaglia,

The American Geriatrics Society (AGS) is pleased to respond to the ABIM request for comments on its proposal to simplify Maintenance of Certification (MOC) for those who are participating in the Longitudinal Knowledge Assessment (LKA) Program by eliminating the requirement that diplomates also earn 100 MOC points every five years. We see this as an important first step in easing the burden of maintenance of certification on our members. If ABIM itself will no longer be providing MOC points to diplomates for each successfully answered question (as is your current practice), we encourage ABIM to consider what policies will be in place regarding MOC requirements for diplomates who fail out of the LKA track and are required to take the high stakes exam with its corresponding requirement that diplomates earn MOC credits.

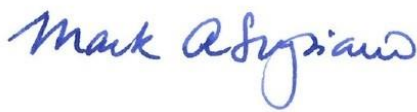
Founded in 1942, the American Geriatrics Society (AGS) is a nationwide, not-for-profit society of geriatrics healthcare professionals dedicated to improving the health, independence, and quality of life of older people. Our 6,000+ members include geriatricians, geriatrics nurse practitioners, social workers, family practitioners, physician associates, pharmacists, and internists who are pioneers in serious illness care for older individuals, with a focus on championing interprofessional teams, eliciting personal care goals, and treating older people as whole persons. Founded in 1990, ADGAP, an affinity group within AGS, provides a vibrant and robust forum for Program Directors and leaders in academic geriatrics to collaborate on building the healthcare workforce we all will need as we age. ADGAP members represent approximately 100 geriatrics academic and fellowship programs from across the United States and abroad. The ADGAP Fellowship Directors Group provides a learning collaborative for geriatrics fellowship directors and has worked to develop training and assessment tools to support geriatrics fellowship programs. AGS/ADGAP believe in a just society, one where we all are supported by and able to contribute to communities where ageism, ableism, classism, homophobia, racism, sexism, xenophobia, and other forms of bias and discrimination no longer impact healthcare access, quality, and outcomes for older adults and their caregivers.

We encourage ABIM to continue to review and innovate within the LKA pathway in order to meet the needs of all diplomates. As an example, we recommend that ABIM consider switching to a total time for the test instead of a per-question time frame (currently set at 4 minutes). We understand that the data that ABIM has been collecting shows that diplomates are able to complete most questions within the four-minute time frame. However, whether or not diplomates are able to answer the question in four minutes does not address the fact that they are reporting that timed questions are a stressor. Both things can be true at the same time and ABIM, as it evaluates and innovates around the LKA pathway, should consider how it can meaningfully address what many diplomates are reporting as a stressor.

We also encourage ABIM to review its communications around the LKA so that there is a common understanding that this is a summative assessment. In its communications, ABIM should be clear that the LKA, in and of itself, does not fulfill a physician's obligation to engage in life-long learning. There appears to be some confusion about this across the internal medicine community. In addition, we think it is important that ABIM recognize that the exam blueprint does not necessarily reflect the full range of knowledge that a clinician in practice needs to know in order to provide high-quality care to the people they serve. Related to geriatrics, we have discussed with the immediate past Geriatric Medicine Board Chair (Dr. Bruce Leff) that our Geriatrics Review Syllabus, the leading core curriculum in geriatric medicine, covers a broader range of knowledge than what is included in the geriatric medicine exam blueprint.

Thank you again for the opportunity to submit comments on the proposed removal of the 100 MOC points requirement for diplomates who are in the LKA certification pathway. If you have questions or require further information, please reach out to Marianna Drootin (mdrootin@americangeriatrics.org).

Sincerely,

Handwritten signature of Mark Supiano in blue ink.

Mark Supiano, MD, AGSF
AGS President

Handwritten signature of Nancy E. Lundebjerg in black ink.

Nancy E. Lundebjerg, MPA
AGS CEO