

October 9, 2018

Attention Accreditation Council for Graduate Medical Education (ACME):

The American Society of Anesthesiologists® (ASA) is an educational, research, and scientific association of physicians organized to raise and maintain the standards of anesthesiology and improve the care of the patient. Since its founding in 1905, the Society's achievements have made it an important voice in American medicine and the foremost advocate for all patients who require anesthesia and relief from pain.

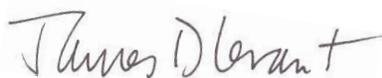
On behalf of 53,000 members, ASA appreciates the opportunity to comment on the proposed revisions of pain fellowship program requirements and are submitting the ACGME's comment form as requested. As the medical specialty representing the recognized leaders in patient safety and quality, we would like to highlight an important issue regarding the proposal to eliminate the requirement that only one accredited pain fellowship may exist per institution.

Pain medicine is a multidisciplinary practice that requires comprehensive education and training in chronic pain management. ASA supports the work ACGME has done to create a strong program around educational requirements for the pain fellowship program with various qualified disciplines, including psychiatry, neurology, physical medicine and rehabilitation, and anesthesiology. However, we have concerns regarding the proposal to remove the requirement of only one accredited pain fellowship per institution. Allowing competing pain fellowships within the same institution will significantly compromise the cooperative multidisciplinary education of future pain fellows. This will also increase competition for patients (decreased training of the pain fellows) and institutional resources, thereby draining these fellowships of the resources needed to adequately run a fellowship training program and also compromise the quality of the training program

ASA supports pain medicine fellowships based in any of the qualified disciplines, including psychiatry, neurology, physical medicine and rehabilitation, and anesthesiology. The Society is also supportive of increasing the number of programs in the country to enable more pain medicine physicians trained to fully address the needs of patients during this crucial time, where the nation is fighting an opioid epidemic. However, we cannot support the proposal to have more than one program per institution. The strain this change would create in an institution with an existing program is far too problematic.

We thank you for your time and consideration. Attached is ASA's comment form.

Sincerely,



James D. Grant, M.D., M.B.A., FASA
President