June 9, 2021

Susan Ramin, MD, Chair, Standards Task Force  
American Board of Medical Specialties  
353 North Clark Street, Suite 1400  
Chicago, IL 60654

Thank you for the opportunity to provide input on the American Board of Medical Specialties (ABMS) Draft Standards for Continuing Certification. The leadership of the American Society of Anesthesiologists (ASA) has reviewed the ABMS Draft Standards and provides the following feedback on the key areas of importance to our members. We have also invited our membership to submit feedback directly via your “Call for Comments” survey. Overall, ASA feels strongly that the current 10-year certification process works well. Thank you for the opportunity to provide feedback on these important standards for continuing certification.

Best Regards,

Beverly K. Philip, MD, FACA, FASA  
ASA President
ASA Response to ABMS Call for Comments on Draft Standards for Continuing Certification, submitted June 9, 2021

Standard #3: Assessment of Certification Status

Member Boards must determine at intervals no longer than five years whether a diplomate is meeting continuing certification requirements to retain each certificate. Policies that specify the basis for certification decisions must be made available to diplomates.

ABMS Commentary
Determining a diplomate’s certificate status (i.e., certified, not certified) at least every five years is consistent with the goal of maintaining currency in medical advances and a commitment to professionalism. Member Boards will have a sufficient, specified phase-in period to allow for the implementation of this standard.

Please provide a rating for Assessment of Certification Status: Unsatisfactory, major revisions needed

ASA Response: We find this unsatisfactory, as the current 10-year certification process works well for anesthesiology because our members participate in a longitudinal learning process with formative assessment throughout their certification cycle. Reducing the interval to five years will significantly increase costs and the time burden on our members with no improvement in evaluation of their currency. If a decision is made to move to a 5-year certification cycle, it should be phased in at the conclusion of the diplomates’ currently active 10-year certification cycle.

Standard #4: Transparent Display of Certification History

Member Boards must publicly and clearly report a diplomate’s certification status and certification history for each certificate held. Member Boards must change a diplomate’s certificate(s) status if standards for performance and participation in continuing certification requirements are not met. Member Boards must use common categories for reporting the status of certificates, with such categories being defined, used, and displayed in the same way. Changes in the status of a certificate must be publicly displayed.
ABMS Commentary

The public believes that a physician certified by an ABMS Member Board has demonstrated the knowledge, clinical skills, and professionalism to practice safely in the specialty. Member Boards have an obligation to the medical community and the public to report the date of initial certification and all subsequent verification dates on their respective websites and/or the ABMS Certification Matters website. For each diplomate, the certification history must include for each certificate: the date of initial certification, whether the diplomate is certified, and whether the diplomate is participating in continuing certification.

Please provide a rating for Transparent Display of Certification History: Unsatisfactory, major revisions needed

ASA Response: We recommend that the wording for lifetime-certified diplomates be “not required to participate in MOCA.” We recommend that those diplomates with “time-limited certification” who are not participating in continuing certification be listed as “Certified but not participating in MOCA.”

Standard #9: Diplomates Holding Non-time-limited Certificates

Member Boards must have a process by which non-time-limited certificate holders can participate in continuing certification without jeopardizing their certification status.

ABMS Commentary

Member Boards must have a process for diplomates with non-time-limited certificates and others not currently participating in continuing certification to apply for and participate in their continuing certification programs. Certificates for non-time-limited certificate holders should not be at risk for failure to meet continuing certification requirements if the diplomate participates in continuing certification; however, Member Board professionalism standards must be upheld by all certificate holders in order to remain certified.

Please provide a rating for Diplomates Holding Non-time-limited Certificates: Unsatisfactory, major revisions needed

ASA Response: ASA recommends that those diplomates with non-time-limited certificates be identified as “not required to participate in MOCA.”
Standard #13: Assessments of Knowledge, Judgment, and Skills

Member Boards must assess whether diplomates have the knowledge, clinical judgment, and skills to practice safely and effectively in the specialty. Member Boards must offer a formative assessment option that supports learning, identifies deficits in knowledge, judgment, and skills, and assists diplomates in staying current in their areas of practice.

ABMS Commentary
In designing their assessment programs, Member Boards should enhance diplomate engagement and capitalize on advances in adult learning theory and internet-based testing. The program should provide learning value to diplomates with actionable feedback, thereby improving the overall assessment experience, while promoting the achievement of the goals a Member Board has set for its continuing certification program.

Formative assessment strategies may vary from Member Board to Member Board. Still, each approach must meet the requirements of the ABMS continuing certification standards for Lifelong Learning, including the requirement to produce a valid and reliable assessment of the knowledge required for quality practice.

Member Boards may choose to offer point-in-time, secure assessments for diplomates who prefer this approach, provided that the board can provide useful feedback to guide diplomate learning. If available, point-in-time secure assessments should be offered at least annually. Diplomates electing this option may be required to take the secure assessment at least once every five years. If a diplomate fails to meet the standard of knowledge required for quality practice, they should be offered an opportunity to address defined knowledge deficits (Standard 5). If standards are not met following the opportunity to address deficits, the diplomate will lose their certificate (Standard 3). For diplomates electing this option, an opportunity to switch to the formatively oriented assessment option should be provided periodically.

Please provide a rating for Assessments of Knowledge, Judgment, and Skills: Satisfactory, minor revisions needed

ASA Response: ASA discourages high-stakes assessments. We recommend longitudinal learning with formative assessment for diplomates to maintain a level of knowledge required for practice.
Standard #14: Use of Assessment Results in Certification Decisions

Member Boards’ continuing certification assessments must meet appropriate psychometric standards to support making defensible, summative decisions regarding continuing certification.

ABMS Commentary
Aggregated performance on assessments should contribute to making certification decisions regarding continuing certification. Assessment that is formative has a background standard of knowledge that is required for quality practice. If a diplomate fails to meet that standard, they should be offered an opportunity to address defined knowledge deficits (Standard 5). If standards are not met following the opportunity to address deficits, the diplomate will lose their certificate (Standard 3). Member Boards should ensure that subject matter experts engaging in assessment development are clinically active.

Regarding security, Member Boards should have a code of conduct for participation and require a diplomate’s promise to abide by the code. Each Member Board must authenticate user identity via appropriate security procedures. Security methods should reflect the importance of making accurate continuing certification decisions without inflicting unnecessary burdens on participating diplomates.

Please provide a rating for Use of Assessment Results in Certification Decisions: Unsatisfactory, major revisions needed

ASA Response: ASA feels major revisions are needed here. The sharing of aggregate data from the ABA MOCA Minute high-priority topics with ASA effectively helps close the knowledge gaps identified in longitudinal assessment. We agree with the ABA that a performance assessment should be a part of standard certification, but performance based on the assessment alone should not be the grounds for losing certification status.