November 30, 2021

Board of Directors
American Board of Dermatology
2 Wells Avenue
Newton, Massachusetts 02459

Attention: Hensin Tsao, MD, President
Attention: Edward Cowen, MD, Vice President

Dear Members of the Board:

In 2018, the American Board of Dermatology (ABD), a member board of the American Board of Medical Specialties (ABMS), approved subspecialty board certification in Micrographic Dermatologic Surgery (MDS).

Despite including a “license to practice medicine or osteopathy” as a prerequisite for taking the exam, Mohs surgeons primarily certified by the American Osteopathic Board of Dermatology (AOBD) are currently ineligible to sit for the MDS exam, even if they completed an ACGME-accredited fellowship in Mohs surgery and dermatologic oncology.

Yet, the very same criteria allow any ABD-certified physician practicing Mohs – even those who are not fellowship trained – to sit for the MDS exam during its first 5 years. The criteria also allow members of the American Board of Plastic Surgery (ABPS) and the American Board of Otolaryngology - Head and Neck Surgery (ABOHNs) to sit for the MDS exam. These are boards outside of dermatology; yet DOs within the house of dermatology – those initially certified by the AOBD – are excluded. This defies logic and is discriminatory against fellowship-trained Mohs surgeons as well as non-fellowship-trained dermatologists who are DOs.

According to the ABD website1, candidates for the MDS subspecialty certification must:

1. Possess a current, valid, full and unrestricted license to practice medicine or osteopathy in at least one state or province within the United States or Canada;
2. Hold primary certification in general dermatology from ABD;
3. Be up to date in Maintenance of Certification (MOC) if certification by ABD is time-limited;
4. Demonstrate experience in the subspecialty by:
   a. successfully completing the ACGME-accredited MSDO fellowship, OR
   b. during an initial 5-year practice pathway eligibility period only, attesting to practicing micrographic surgery,* and
5. Pass the MDS certification examination.
These eligibility criteria ignore profound changes in graduate medical education and accreditation that have occurred over the past 5 years.

1. As of 2020, the ACGME and the American Osteopathic Association (AOA) completed their transition to the Single Accreditation System (SAS), under which 100% of residency and fellowship programs in the United States are accredited by ACGME.¹ This means there are no longer osteopathic or AOA-accredited residencies or fellowships in the US; all programs are now accredited by the ACGME.

2. During the SAS transition period between 2015 and 2020, many residents graduated from AOA-accredited residencies that are now ACGME-accredited. The change in program accreditation occurs on paper alone at the beginning of each academic year, but now prevents DOs who graduated before their program achieved ACGME accreditation from sitting for ABD subspecialty exams, such as dermatopathology or MDS.

3. During the transition to the single ACGME accreditation system, other ABMS boards, including the massive ABIM, have instituted special criteria to allow DOs with AOA residency training, but ACGME fellowship training, to sit for ABIM board exams.² The ABEM (Emergency Medicine) will allow candidates with an initial AOA certification in EM to sit for the ABEM subspecialty exam in Emergency Medical Services; and the ABPM (Preventive Medicine) will allow AOA-certified physicians to sit for the ABPM certifications in Addiction Medicine or Clinical Informatics.

4. Starting in 2019 (prior to the approval of the ABMS MDS subspecialty and exam), the ACGME enacted new Common Program Requirements (CPR) for all ACGME residency and fellowship programs. These new requirements state that completing either an AOA or ACGME-accredited residency is acceptable primary training for entry into all ACGME fellowships.

5. Starting in 2019, the ACGME Dermatology Review Committee also changed their requirements to state that AOA residency training is adequate primary certification for any and all ACGME dermatology fellowships.

The recent changes in US graduate medical education have created a terrible mismatch between training and certification requirements. For example, as of today, the DO program director of an ACGME-accredited Mohs fellowship isn’t eligible to take the ABD MDS exam, but the Mohs fellow that be/she trained is eligible for that exam. DOs who graduated from a former AOA program cannot sit for the ABD MDS, dermatopathology, or pediatric dermatology exams, even if they completed ACGME fellowships in these subspecialty areas, and even though the osteopathic residency they graduated from is now ACGME-accredited.

The ACGME and its dermatology RC have stated that AOA residency training fully qualifies a candidate to complete any and all ACGME dermatology fellowships. We ask that the ABMS stop excluding AOA-certified DO dermatologists who have completed ACGME fellowships from taking the corresponding board exams.

From this point forward, there exist only ACGME training programs in the United States. This means that all DO dermatologists will graduate from ACGME training programs, just like their MD dermatologist colleagues. Why should the ABD exclude competent DOs practicing in all subspecialties of dermatology based on an artificial training distinction that no longer exists?
The field of dermatology is a small, close-knit community of MDs and DOs who have spent decades developing the medical field that we love. Yet today, our specialty is constantly being encroached upon by non-dermatologists and even non-physicians. To protect our specialty and those of us who have attained the highest standards of dermatologic training, we must standardize dermatology certification, just as we have standardized US dermatology training.

We request that the ABD recognize AOBD-certified dermatologists as qualified and eligible to take all ABD subspecialty exams, as well as relevant ABD maintenance of certification exams and/or CertLink.

This allows all dermatologists to participate in ABD certifying exams regardless of primary certification from ABD or AOBD. Allowing both MDs and DOs to take ABD certifying exams aligns certification with the recent unification of graduate medical training under ACGME.

It is time for US dermatologists to present ourselves as one united group, to both regulatory agencies and the public. We must hold ourselves to a single standard, presenting a unified front to the public and to those who would try to usurp our specialty. Our patients deserve this, and so does the future of dermatology.

On behalf of the American Osteopathic Board of Trustees and membership, thank you for your consideration in this matter.

Fraternally,

David W. Cleaver, DO, FAOCD
President, 2021-2022
American Osteopathic College of Dermatology

DWC/maw

Cc: American Osteopathic College of Dermatology Board of Trustees
Michael Scott, III, DO, President, American Osteopathic Board of Dermatology
Kevin Klauer, DO, CEO, American Osteopathic Association
Andrea Ciccone, Senior Vice President, Certifying Board Services, American Osteopathic Association

3. ABIM Candidates for Special Consideration – Graduates of AOA-accredited training programs who have completed ACGME-accredited fellowship training: https://www.abim.org/certification/policies/candidates-for-special-consideration.aspx
4. Personal communication with Joshua L. Prober, JD; Senior Vice President & General Counsel, American Osteopathic Association
6. ACGME Program Requirements for Graduate Medical Education in Micrographic Surgery and Dermatologic Oncology: https://www.acgme.org/Portals/0/PFAssets/ProgramRequirements/081_MSDO_2020_July.pdf?ver=2020-06-30-092040-887