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Asher Tulsky, MD Chair, Internal Medicine Board American Board of Internal Medicine 510 Walnut Street, Suite 1700 Philadelphia, PA 19106-3699

Dear Dr. Tulsky:

On behalf of the Alliance for Academic Internal Medicine (AAIM), thank you for the opportunity to provide feedback about the American Board of Internal Medicine (ABIM) recommendation regarding procedural competency.

The Alliance agrees with the ABIM's four recommendations. While acknowledging that procedural competence is essential for internal medicine residents, they provide needed flexibility to program directors to base their attestation on programmatic and trainee-specific factors. In our letter from September 2018, we expressed that, "Given the substantial variability in size, mission, and resources of internal medicine training programs, the Alliance believes that similar (program) autonomy should underpin procedural requirements." Further, we elaborated that, "programs should make available opportunities to develop skills for residents who are planning subspecialty training or careers in fields that require procedure skills." If finalized, these standards would align well with our recommendation.

Issued in April 2017, the Alliance's *Guidelines for the Program Director Letter of Recommendation for Fellowship Applicants* encourages letters to include skills sought beyond residency requirements and an assessment of the resident's suitability for fellowship training in a subspecialty of choice. Thus, the ABIM recommendation would more closely reflect the broad-based assessment that Alliance currently encourages its members to adopt in the fellowship letter.

In partnership with ABIM, the Alliance looks forward to educating its members about changes in ABIM initial certification. Given the rollback in procedural competency previously, we are confident that we can develop resources to prepare our members and their trainees for this transition. These might include resources to aid program directors' decision-making about procedural competency based on skills relevant to various career paths.

Again, thank you for the opportunity to provide feedback on the procedural competencies for initial ABIM certification. If you have any questions or need additional information, please contact me at (703) 341-4540 or AAIM@im.org.

Sincerely,

D. Craig Brater, MD

President and CEO Alliance for Academic Internal Medicine