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July 15, 2024

***Re: Request for Transparency and Ready Accessibility of the ABIM Policy on Full Refunds for Medically Required Cancellations of Examinations***

Dear ABIM Staff Leaders:

On behalf of the American College of Physicians (ACP), we write to formalize our requests for clarity and transparency relating to ABIM's policies and fees for medically necessary examination cancellations. During email communications between Dr. Chick, Dr. McDonald, and Mr. Melfe, in which ACP expressed concerns brought forward by ACP members relating to ABIM's posted cancellation policies, ACP learned that ABIM does approve, on a case-by-case basis, full refunds for medically required cancellations of initial certification exams and full credit for rescheduling of cancelled MOC exams. However, ABIM does not include vital information on the availability of a full refund cancellation within posted ABIM exam cancellation and refund policies on the current webpage. In fact, ABIM webpages at the time of the initial discussion had stated the contrary, that "no extenuating circumstances" would be considered relating to posted cancellation fees. After ACP raised this concern and requested greater clarity and accessibility of medical cancellation processes, ABIM identified and removed the "no exceptions" language from multiple ABIM webpages. The ACP applauds this initial step. However, during our discussion at ACP headquarters on June 26, 2024, we identified that ABIM posted policies still do not state full refunds for medically necessary cancellations are available for exam registrants requiring these accommodations.

Further progress supporting the clarity and accessibility of the stated ABIM policy is needed. Current registrants remain unaware of, and have no mechanism to access, a medically necessary cancellation without financial penalty. The ACP Board of Regents (BOR) has asked the ACP

Education Committee to address member concerns relating to such cancellation fees. ACP members have reported that cancellation of their exam due to medical concerns arising after posted ABIM exam registration deadlines results in a financial penalty and this is the only process identified on the current webpage.

Additionally, ACP members have expressed concern that ABIM's 60 day minimum notice for requesting pregnancy accommodations does not allow for unanticipated needs related to pregnancy that may arise within 60 days of an exam. Physicians have higher rates of preterm labor than the general population, which may result in the need for accommodations related to late stages of pregnancy or lactation that were not known 60 days in advance of the exam date. In early pregnancy one may not know of medical challenges that require accommodations greater than 60 days before a scheduled exam.

Compounding these concerns, currently posted ABIM policies specify that applicants must cancel the exam via the web using the Physician Portal and that "*ABIM will not accept cancellations by phone*", causing registrants to be left without a mechanism to discuss their needs and with the perception that ABIM does not wish to listen to their concerns.

We thank Dr. Battaglia and Mr. Melfe for accepting the ACP Education Committee's invitation to attend a June 26 2024 meeting to discuss our requests for greater clarity and transparency of ABIM's exam cancellation fees and policies. At that meeting, ACP leadership explained that removal of the barrier "*no exceptions*" language was a necessary and appreciated step, but an insufficient step toward policy transparency. The Education Committee requested clear language and easily accessible information regarding fees and prompt placement of the cancellation policy during the registration/application process.

As of July 12, 2024, the ABIM page on "Initial Certification Exam Fees and Refund Policies" [<https://www.abim.org/certification/exam-information/exam-fees-refund-policies>] continues to report financial penalties for cancellations, and does not state the availability of an option for medically necessary cancellation with full refund.

**Therefore, we urge the ABIM to take the following actions:**

- 1. State within posted "Initial Certification Exam Fees and Refund Policies," and within all other relevant materials, including individual registration confirmation materials, that an option is available for medically necessary cancellation of an examination with full refund.**
- 2. Provide within the posted "Initial Certification Exam Fees and Refund Policies," and within all other relevant materials, an easily accessible process for requesting a medically necessary cancellation with full refund.**
- 3. Remove the 60 day prior notification window for people who are pregnant or with lactation needs postpartum and provide the option to reschedule their examination if their pregnancy or lactation needs cannot be accommodated by testing centers.**
- 3. Provide a clearly accessible and easy to use system for physicians to reach ABIM support staff in order to report and discuss any urgent concerns regarding a scheduled examination.**

The upcoming initial certification cycle brings renewed concerns from physicians who seek ABIM certification. We urge the ABIM to reduce physician concerns and garner more physician trust by providing clarity in its policies, supporting pregnant and lactating physicians, and offering a communication system appropriate for use in urgent situations. Physicians should have trust that the ABIM will prioritize physician health over exam revenue, and must have a mechanism to access ABIM assistance to be heard when they are in need. The ACP fully supports its membership and looks forward to the ABIM changes that support clarity and builds trust with physicians.

Sincerely,



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Vice Chair, Education Committee, American College of Physicians



Davoren Chick, MD, FACP  
Chief Learning Officer and Senior Vice President, Medical Education, American College of Physicians



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