

September 10, 2020

To the American Board of Internal Medicine,

We are writing to implore your reconsideration of the policy currently in place regarding written request and review for adequate accommodations provided to pregnant or nursing mothers scheduled to take a board certification exam. Given the intensity of preparation required prior to a certification exam, we believe it is highly inappropriate to place additional burden on women already under tremendous mental and physical stress. Additionally, we believe this policy runs counter to the ABIM's mission and stated accountability to the profession of medicine and to the public.

As currently written, the ABIM policy requires those women needing accommodations in support of their pregnancy or breast feeding during the exam period to submit a request form signed by their treating physician to the ABIM at least 60 days in advance of their scheduled exam. That request is then subject to review by the ABIM, and may result in rejection, exam cancellation and/or rescheduling. For women whose requests do not meet the ABIM's approval, or who do not realize this policy requirement in due time, the consequence is severe. They must make difficult decisions to either proceed with the exam as scheduled without appropriate accommodations or to reschedule their exam, jeopardizing their professional future. We were recently made aware of one such case where a woman, because her accommodation request was rejected, was considering pumping breastmilk in her car on her exam lunch break. This is a demeaning and demoralizing consequence handed down by an organization which is said to represent the integrity of physicians.

The American Association of Obstetricians and Gynecologists currently recommends exclusive breastfeeding for the first 6 months of life, with continued breastfeeding as complementary foods are introduced during the infant's first year of life. The ABIM's entire premise is to assess the clinical judgment, skills, and attitudes essential for the delivery of excellent patient care. That the ABIM does not immediately allow for the accommodation of pregnant or nursing mothers during exam periods is a direct contradiction to its stated purpose.

We recognize that creating special accommodations of this nature can be costly and may require reconfiguration of exam spaces, and that the ABIM works with external

vendors to secure exam space. We recognize the need to plan for these accommodations in advance, and that a request system is essential for planning purposes. We also recognize that not all requests may be reasonable and should be subject to discussion. We do not understand, however, requiring multiple steps in a request process for reasonable accommodations nor do we understand the potential for those reasonable requests to be rejected. It is a guilty until proven innocent approach, rather than the appropriate inverse. Given the importance of this issue to the women who comprise nearly half of internal medicine residents, and therefore potential board diplomates, we would encourage your prioritization of making fundamental and essential changes to this flawed policy.

Sincerely,

WOMEN AS ONE