



## American Board of Medical Specialties

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American Board of Medical Specialties  
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April 8, 2013

Cynthia Mann, Deputy Administrator and Director  
Center for Medicaid and CHIP Services  
7500 Security Boulevard  
Baltimore, MD 21244-1850

Cc: Stephen Wasserman, MD, American Board of Allergy and Immunology  
Christine Cassel, MD, American Board of Internal Medicine  
David Nichols, MD, American Board of Pediatrics

Ref: Centers for Medicare and Medicaid Services; 42 CFR Parts 438, 441, and 447 [CMS-2370-F]; Medicaid Program: Payments for Services Furnished by Certain Primary Care Physicians

Dear Ms. Mann:

I am writing on behalf of the American Board of Allergy and Immunology (ABAI) and its diplomates with regard to a recent Medicaid rule that defines as “primary care physicians” any physician certified by one of the ABMS primary care boards. We are writing to clarify the status of the American Board of Allergy and Immunology, which is a sub-discipline of two ABMS primary care boards.

We recognize that the rule implements a provision of the Affordable Care Act intended to induce more physicians to provide primary care services to Medicaid patients. For the many young Medicaid recipients suffering with asthma, the allergist immunologist is their “go to” physician, serving as their care coordinator and primary care provider. Our concern is that these allergists and immunologists may not be reached by the current policy unless their special status as a primary care subspecialty is recognized and acknowledged.

The American Board of Allergy and Immunology (ABAI) is unique among ABMS Member Boards. Unlike other Boards, ABAI is not a fully independent board; it is a conjoint board of the American Board of Pediatrics (ABP) and the American Board of Internal Medicine (ABIM). According to our by-laws, a “conjoint board” is one established under joint sponsorship of two or more ABMS certifying boards. A conjoint board sets training standards and evaluates the qualifications of individual candidates *in an area of specialty practice common to the sponsoring groups* (italics added). While separately incorporated, it functions under the supervision of the two parent boards, meaning its members are appointed and its policies and procedures approved by ABP and ABIM. All physicians certified by the Board of Allergy and Immunology

must first be board certified by either ABP or ABAI. No subspecialty certificates in allergy and immunology are offered by the parent boards unless through the board of Allergy and Immunology. Medical specialists certified by the Allergy and Immunology Board remain subspecialists of the primary care disciplines.

It is possible that some holders of a certificate from ABAI will not have a current primary certificate, because most diplomates of the ABP and ABIM who hold subspecialty certificates, whether in cardiology, gastroenterology or other practice areas, are not required to maintain their primary certificates. These diplomates of the ABAI might be excluded under a strict interpretation of the rule, but could be included if allergy and immunology certificate holders are treated like other subspecialty certificate holders within the primary care boards for the purposes of this rule. We do not believe a change in the rules themselves is necessary so long as CMS recognizes that diplomates of ABAI are, in fact, subspecialists in the primary care disciplines.

We respectfully ask that CMS recognize that diplomates of ABAI are subspecialists in the primary care disciplines. We hope this will increase access to allergists and immunologists to children and families covered under the Medicaid program. If you have questions, please contact us.

Sincerely,

Lois Margaret Nora, MD, JD, MBA  
President and Chief Executive Officer

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