



## American Board of Medical Specialties

*Higher standards. Better care.®*

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September 20, 2022

Marschall Smith  
Executive Director  
Interstate Medical Licensure Compact Commission  
5401 South Prince Street, Office 111  
Littleton, Colorado 80120

Submitted via email

RE: IMLC Rule Chapter 6 Comments

Dear Mr. Smith:

On behalf of the American Board of Medical Specialties (ABMS), I want to thank you for the opportunity to provide feedback on the proposed changes to IMLC Rule Chapter 6, relaxing the mandatory disciplinary actions by all Compact member boards if disciplined by any board.

ABMS represents a community of 24 medical specialty boards that develop the educational and professional standards needed to certify specialty physicians. ABMS and its Member Boards certify more than 920,000 specialty physicians in the United States. ABMS supports the proposed changes as we view them as necessary for protecting the ability of our diplomates to provide safe and essential clinical care to their patients.

As legislative, regulatory, and judicial actions at state and federal levels restrict the ability of physicians to provide medically necessary care to their patients, we understand some state medical boards may have no choice but to take action against licensees for observing their duties to their patients. If a physician is participating in the IMLC, such an action under the current rule would restrict their ability to practice in any other compact state, even in those state that continue to allow for the provision of such vital care.

ABMS supports the safe and unencumbered delivery of evidence-based health care to patients, and we believe the proposed changes to Rule 6 protect physicians who are committed to this purpose. The rule change will also provide clarity to physicians who are increasingly forced to make the untenable choice between treating their patients and interpreting a conflicting patchwork of state and federal regulations.

Thank you again for the opportunity to comment, and we urge the Commission to adopt the proposed changes to Rule 6.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas Granatir".

Thomas Granatir  
Senior Vice President for Policy and External Relations