

April 29, 2021

**Brett Wagner, MD**

Executive Director

**Paul Wallner, DO, FASTRO**

Associate Executive Director for Radiation Oncology

American Board of Radiology

5441 E. Williams Circle

Tucson, AZ 85711

Dear Dr. Wagner and Dr. Wallner,

Thank you for providing ASTRO, the leading society for radiation oncologists, the opportunity to provide feedback to the ABR about its proposed policy regarding parental leave. We are supportive of the American Board of Medical Specialties suggested 6-week parental leave policy for residencies longer than two years and are pleased to share our thoughts with you on this important topic. We understand that during this public comment period, the ABR's perspective about leave has evolved. We also realize that the ABR policy applies to a trainee's eligibility to sit for ABR exams without needing to extend training. We appreciate that different home institutions will have different paid and unpaid leave policies that cover vacation, family & medical leave, etc.

The wellness of radiation oncologists is a key focus of ASTRO and in our 2020 membership survey, 85% of radiation oncologists and residents said that "personal challenges" will be "somewhat/very/absolutely critical" to them as a physician in the next three years. The top challenges for radiation oncologists included maintaining work/life balance and dealing with feelings of stress or burnout. Not surprisingly, the top challenges for residents were finding/starting a new job and maintaining work/life balance.

We offer our comments about the proposed leave policy in the context of this data indicating that radiation oncologists and trainees are struggling with work/life balance. The ABR's proposed policy regarding resident leave will help to create a more supportive culture for the specialty. Normalizing more extended leaves for all parents, regardless of gender, is important progress towards creating more equitable and inclusive training programs.

We understand that the ABR is now considering a policy that would allow for an average of seven work weeks (35 workdays) per year, each of the years of a four-year residency. Given the current confusion about how this policy would be operationalized, we encourage ABR to provide more details. If the policy means that a resident could take *no more* than 35 days in any one year, ASTRO is concerned that this amount of time is insufficient for parental leave and would not be supportive of the policy. Alternatively, if the policy means that ABR allows for 140 days of leave throughout the course of residency (35 days x 4 years residency = 140 days) to be

allocated per the Program Director's discretion, then ASTRO would be supportive. Whereas a 140 day bank of available leave would provide flexibility for residents to manage work/life balance, including the time needed for fertility treatment, pregnancy, birth, adoption, breast feeding and bonding with a child, a restrictive policy that limits leave to no more than 35 days in a year is not reasonable. We strongly recommend that the ABR clarify this important point prior to finalizing the policy. ASTRO recommends the ABR adopt the approach that would grant a resident a total of 140 days of leave to be taken at any point during residency for any reason. We are very supportive of this approach as it will contribute to improvements in the health and well-being of the radiation oncology community. We also recommend that the policy be gender neutral to promote and normalize parental leave for all parents. Once finalized, we encourage the ABR to implement the leave policy so it applies to all residents currently in training regardless of what year of training they are in.

We appreciate your duty as a specialty Board to ensure the clinical competence of initially certified radiation oncologists. We encourage the ABR to strive towards competency-based assessment in the long-term, with more clarity on what minimum time and/or competency-based requirements are required for trainees to be eligible to sit for the ABR exams. Time as a surrogate for adequate training is potentially detrimental to those who need professional flexibility due to family planning or personal crisis, but who are otherwise prepared (based on program director input) to sit for their ABR exams.

We appreciate the opportunity to provide comments on this proposed policy which has the potential to positively impact on our field and beyond. We encourage supporting and normalizing extended leave for all parents, while clarifying what the upper limit of leave time is and definition of minimal clinical competency for trainees to be eligible to take their exams. We appreciate your leadership in prioritizing the health and wellness of radiation oncology trainees and their families.

Sincerely,

A handwritten signature in cursive script that reads "Laura Thevenot".

Laura Thevenot  
Chief Executive Officer