

SCAROP

April 23, 2021

Brett Wagner, MD
Executive Director
Paul Wallner, DO, FASTRO
Associate Executive Director for Radiation Oncology
The American Board of Radiology

Dear Dr. Wagner and Wallner,

Thank you so much for providing SCAROP with the opportunity to provide feedback to the ABR about its proposed policy regarding parental leave. We all share a goal of the health and well-being of the physician community. We are pleased that the ABMS has proposed a 6 week parental leave policy for residencies longer than two years, and that you are working to update the ABR policy. More humane leave policies are needed and are long overdue. We realize that the ABR policy applies to a trainee's **eligibility** to sit for ABR exams, that all US employees are entitled to 12 weeks of leave under the Family Medical Leave Act, and that medical centers have a wide array of (paid and unpaid) leave policies.

We appreciate your duty as a specialty Board to the public to ensure the clinical competence of initially certified radiation oncologists. We have discussed the various ACGME and ABR requirements for radiation oncology trainees (450 sims, 36 clinical months/27 clinical months for Hollman pathway) to consider how they result in a trainee's clinical competence. In the absence of mature competency-based training evaluation methods, we appreciate that a time-based leave policy is an interim solution. As time is an imperfect measure of competency, in addition to this policy, we think that the ABR should provide a mechanism for radiation oncology program directors to exercise discretion to allow residents to sit for Board exams as they achieve competencies for all requisite skills.

We understand that during this public comment period, the ABR's thinking about leave has evolved and you are now considering a policy which would allow a resident to miss seven weeks (35 days) of training per year each of the four years of residency for a total of 140 days of leave during a residency for any reason – vacation, medical, or parental leave. As we understand it, this policy would create a bank of 140 days of leave at the beginning of residency to be used throughout the course of residency without needing to extend residency training. Programs would be required to track these days for the purposes of eligibility for ABR initial certification exams. This bank of 140 days could be used in many different configurations and

could for example enable a resident to take a 12-week leave (60 days) for parental leave, as well as 4 weeks of vacation per year (20 days of vacation x 4 years = 80 days) during residency without extending training. We applaud this more generous approach and commend you for the flexibility of this proposed policy. Once finalized, we encourage the ABR to implement retroactively so it applies to all residents currently in training.

We appreciate your consideration of our comments on the updated draft policy. Again, we realize that FMLA and other local institutional policies govern other aspects of leave. The ABR policy only defines the maximum amount of leave time before a resident would be required to extend training in order to be considered Board eligible. As such, your leadership on this important issue sets the tone for the field, and our reputation for being supportive of physician and family wellness. We are strongly supportive of your updated seven week per year approach as it would help support a culture of physician wellness from the beginning of training.

Sincerely,

Louis Potters, MD, FASTRO
On behalf of SCAROP Executive committee