

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard, Mail Stop S2-26-12
Baltimore, Maryland 21244-7850



MAY 30 2013

Lois Margaret Nora, MD, JD, MBA
President and Chief Executive Officer
American Board of Medical Specialties
222 North LaSalle Street, Suite 1500
Chicago, IL 60601

Dear Dr. Nora:

Thank you for your letter on behalf of the American Board of Allergy and Immunology (ABAI) with regard to the recent Medicaid rule that provides for higher Medicaid payment at the Medicare rate to physicians who are certified by the American Board of Medical Specialties (ABMS) in internal medicine, family medicine or pediatrics. You wished to clarify that the ABAI is an ABMS-recognized sub-discipline of the American Board of Pediatrics and the American Board of Internal Medicine.

Specifically, you indicate that the ABAI is a conjoint board of the American Board of Pediatrics (ABP) and the American Board of Internal Medicine (ABIM). All physicians certified by the Board of Allergy and Immunology must first be board certified by either ABP or ABIM. Medical specialists certified by the Allergy and Immunology Board remain subspecialists of Internal Medicine and Pediatrics. However, it is possible that some holders of a certificate from ABAI will not have a current certificate in Internal Medicine or Pediatrics because some diplomats of the ABP and ABIM who hold subspecialty certificates are not required to maintain their primary certificates. You are concerned that these diplomats might be excluded from eligibility for higher payment under a strict interpretation of the rule and urge that CMS formally recognize that diplomats of ABAI are, in fact, subspecialists in Internal Medicine and Pediatrics.

We appreciate the information that you have provided on the relationship between the specialty Boards identified in the regulation and the certification status of allergists. Based on this information, we agree that allergists should be recognized for higher payment under the rule. We also agree with your assessment that no change to the rule is necessary, but we will issue guidance through the Questions and Answers posted on Medicaid.gov to make this clear.

Sincerely,

A handwritten signature in black ink, appearing to read "Cindy Mann", is positioned above the typed name.

Cindy Mann
Director