

June 24, 2019

**Comment on (CMS-1716-P) CMS-2019-08330: Medicare Program: Hospital Inpatient Prospective Payment Systems for Acute Care Hospitals and the Long-Term Care Hospital Prospective Payment System and Proposed Policy Changes and Fiscal Year 2020 Rates; Proposed Quality Reporting Requirements for Specific Providers; Medicare and Medicaid Promoting Interoperability Programs Proposed Requirements for Eligible Hospitals and Critical Access Hospital**

**The American Association of Colleges of Osteopathic Medicine (AACOM) writes in support of the proposed rule change on how full-time equivalent (FTE) resident time may be counted when residents train at critical access hospitals (CAHs).** AACOM is in alignment with the American Osteopathic Association with regard to our position on this provision.

AACOM leads and advocates for the full continuum of osteopathic medical education (OME) to improve the health of the public. Founded in 1898 to support and assist the nation's osteopathic medical schools, AACOM represents all 35 accredited colleges of osteopathic medicine—educating nearly 31,000 future physicians, 25 percent of all U.S. medical students—at 55 teaching locations in 32 U.S. states, as well as osteopathic graduate medical education professionals and trainees at U.S. medical centers, hospitals, clinics, and health systems.

A well-trained physician workforce is essential to ensuring that Medicare beneficiaries and all Americans have access to high-quality health care. OME plays a key role in the development of the future physician workforce, particularly the primary care workforce. Colleges of osteopathic medicine (COMs) — many of which are located in rural areas — have a standing commitment to and focus on training primary care physicians, which mirrors the special commitment osteopathic physicians have in providing primary care, particularly to the nation's rural and underserved populations. In fact, according to the most current available data, [32 percent of graduates](#) indicated their intent to specialize in the primary care disciplines general internal medicine, general pediatrics, and family medicine.

COMs across the country provide clinical training in a variety of community-based settings, within hospitals and in other health care training facilities. There is growing evidence of the need for community-based medical education to produce an outcome that will address the demand for a primary care-based health care system that provides access and value to populations in both rural and urban medically-underserved areas. As the nation faces a physician workforce shortage, federal policies must support the educational pathway of the future health care workforce to meet the nation's health care needs. Furthermore, as educators of future

physicians, we support policies that would improve access to health care in rural medically underserved areas where shortages are dire and are expected to continue on this trajectory without effective solutions.

**Therefore, AACOM is pleased with the CMS proposal that, effective October 1, 2019, a hospital may include in its FTE count time spent by residents training at a CAH, so long as the hospital meets the nonprovider setting requirements located at 42 C.F.R. §§ 412.105(f)(1)(ii)(E) and 413.78(g).** AACOM agrees with CMS and the proposed rule that it is important to support residency training in rural and underserved areas, including residency training at CAHs. By allowing Medicare to reimburse medical residency programs for the time residents spend training at CAHs, it would help spur the expansion of rural residencies, increase the number of physicians training in rural settings, and encourage more medical professionals to practice in rural communities.

Thank you for the opportunity to share our views. If you have any questions or require further information, please contact Mary-Lynn Bender, Interim Vice President of Government and Public Relations, at 202-844-4220 or [mlbender@aacom.org](mailto:mlbender@aacom.org), or Julie Crockett, Senior Federal Regulatory Affairs Manager, at (202) 844-4231 or [jcrockett@aacom.org](mailto:jcrockett@aacom.org).