

June 25, 2018

Ms. Seema Verma
Administrator
Centers for Medicare & Medicaid Services
U.S. Department of Health and Human Services
Attention: CMS-1694-P
P.O. Box 8011
Baltimore, MD 21244-1850

Via electronic submission at regulations.gov

Re: (CMS-1694-P) CMS-2018-0046: Fiscal Year (FY) 2019 Medicare Hospital Inpatient Prospective Payment System (IPPS) and Long Term Acute Care Hospital (LTCH) Prospective Payment System Proposed Rule

Dear Administrator Verma:

On behalf of the American Association of Colleges of Osteopathic Medicine (AACOM), I am writing in support of the provision regarding proposed changes to Medicare graduate medical education (GME) affiliated groups for new urban teaching hospitals as included in the *Fiscal Year 2019 Medicare Hospital Inpatient Prospective Payment System and Long Term Acute Care Hospital Prospective Payment System Proposed Rule*.

AACOM represents the 34 accredited colleges of osteopathic medicine (COMs) in the United States. These colleges are accredited to deliver instruction at 51 teaching locations in 32 states. In the current academic year, these colleges are educating nearly 29,000 future physicians—more than 20 percent of all U.S. medical students.

A well-trained physician workforce is essential to ensuring that Medicare beneficiaries and all Americans have access to high-quality health care. 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. Therefore, AACOM is pleased with the CMS proposal that would enable new urban teaching hospitals to loan slots to other new urban teaching hospitals beginning July 1, 2019 through June 30, 2020. Additionally, we appreciate that CMS recognizes the importance of providing flexibility regarding Medicare GME affiliation agreements due to the statutory requirements that place restrictions on the number of full-time equivalent (FTE) residents that a hospital may count for direct GME and indirect medical education payment purposes.

However, AACOM requests that CMS provide additional guidance regarding its definition of new urban teaching hospitals that may form a Medicare GME affiliated group, thus enabling these entities to receive both decreases and increases to their FTE caps under the proposal. Although it is our understanding that the current definition of a new teaching hospital is any hospital that built its FTE cap after the 1996 base year set by the *Balanced Budget Act of 1997* (P.L. 105-33), clarification would help verify conflicting information received from CMS on this issue.

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.

Thank you for the opportunity to share our views. If you have any questions or require further information, please contact Pamela Murphy, Senior Vice President of Government Relations, at (202) 844-4217 or pmurphy@aacom.org, or Julie Crockett, Federal Regulatory Affairs Manager, at (202) 844-4231 or jcrockett@aacom.org.

Respectfully,

A handwritten signature in black ink, appearing to read "SC Shannon". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Stephen C. Shannon, DO, MPH
President and CEO