August 29, 2013

Bahar Niakan
Director, Division of Policy and Information Coordination
Health Resources and Services Administration (HRSA)
Department of Health and Human Services
Parklawn Building, 5600 Fishers Lane
Rockville, MD 20857
Sent via email: OIRA submission@omb.eop.gov

RE: Teaching Health Center Graduate Medical Education (THCGME) Program Eligible Resident/Full-Time Equivalent (FTE) Chart

Dear Director Niakan:

On behalf of the Council of Academic Family Medicine (CAFM), including the Society of Teachers of Family Medicine, Association of Departments of Family Medicine, Association of Family Medicine Residency Directors, the North American Primary Care Research Group, along with the American Academy of Family Physicians (AAFP), we are pleased to submit comments on the Health Resources and Services Administration information collection request titled the Teaching Health Center Graduate Medical Education (THCGME) Program Eligible Resident/Full-Time Equivalent (FTE) Chart as published in the August 1, 2013 Federal Register.

As stated, the THCGME program eligible resident/FTE chart is a means for determining the number of eligible residents/FTEs in a potential teaching health center's (THC)' primary care residency program. The chart requires programs to provide data to HRSA related to the size and/or growth of the residency program over previous academic years, the number of residents enrolled in the program during the baseline academic year, and a projection of the program's proposed expansion over the next four academic years.

Our organizations appreciate that HRSA continues to monitor and support teaching health centers in order to increase the production of primary care residents practicing in community settings. As HRSA contemplates revisions to the THCGME FTE chart, we urge you to ask teaching health centers about residents in post-graduate years 4 and 5 in order to accommodate combined programs and those with 4 and 5 year curricula. In addition, we suggest that HRSA expand the survey to include a means to capture the status of residents leaving the program, much in the same way that the Accreditation Council for Graduate Medical Education (ACGME) captures this information in the annual online data survey (WebADS). They capture graduation, transfers (with reason for transfer) or dismissal. We believe this additional information would be useful to create



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context for programs where the numbers may not follow the anticipated pattern of matriculation, education, and then graduation.

We appreciate the opportunity to respond to the information collection request and continue to be supportive of the development of data regarding the utility of the Teaching Health Center program. Should you have any questions regarding this letter, please feel free to contact Hope R. Wittenberg, CAFM Director of Government Relations, at hwittenberg@stfm.org or 202-986-3309, or Robert Bennett, AAFP Federal Regulatory Manager, at rebennett@aafp.org or 202-232-9033.

Sincerely,

John Saultz, MD MSPH

President

Society of Teachers of Family

Medicine

Jeffrey Cain, MD

President

American Academy of Family

Physicians

Michael Tuggy, MD

President

Association of Family Medicine

Residency Directors

Barbara Thompson, MD

President

Association of Departments of

Durlara Thongson, US

Family Medicine

Frank V. deGruy, III, MD, MSFM President North American Primary Care Research Group