

## ACGME Requirements Review and Comment Form

Title of Requirements	Common Program Requirements (Residency) Common Program Requirements (Fellowship) Common Program Requirements (One-Year Fellowship) Common Program Requirements (Post-Doctoral Education Program)
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Organizations submitting comments should indicate whether the comments represent a consensus opinion of their membership or whether they are a compilation of individual comments.

Select [X] only one	
Organization (consensus opinion of membership)	X
Organization (compilation of individual comments)	
Review Committee	
Designated Institutional Official	
Program Director in the Specialty	
Resident/Fellow	
Other (specify):	

Name	D. Craig Brater, MD
Title	President and CEO
Organization	Alliance for Academic Internal Medicine (AAIM)

As part of the ongoing effort to encourage the participation of the graduate medical education community in the process of revising requirements, the ACGME may publish some or all of the comments it receives on the ACGME website. By submitting your comments, the ACGME will consider your consent granted. If you or your organization does not consent to the publication of any comments, please indicate such below.

The ACGME welcomes comments, including support, concerns, or other feedback, regarding the proposed requirements. *For focused revisions, only submit comments on those requirements being revised.* Comments must be submitted electronically and must reference the requirement(s) by requirement number, indicated by strike-through and underline. Add rows as necessary.

**Special Instructions for Common Program Requirements:** The ACGME invites the community to comment on the proposed focused revision for all four versions of the Common

Program Requirements. You may choose to comment on just one version, or to give feedback on more than one, but **use only one form** to submit all comments. Please indicate below which version(s) your comments relate to:

- Residency
- Fellowship
- One-Year Fellowship
- Post-Doctoral Education Program

	Requirement Number	Comment(s)/Rationale
1	II.A.2	Program Directors (PDs) and Fellowship Directors (FDs) rank time as paramount to ensuring a successful GME program. It is clear that ACGME agrees with this sentiment, though it was omitted from the Common Program Requirements (CPRs). Program management and oversight vary across GME institutions. To mitigate potential disadvantages in FTE allocation, AAIM requests that RC-IM consider re-instating the 20% minimum FTE of non-clinical time dedicated to program administration. Each GME program will have the flexibility to assign a larger FTE allocation, contingent upon that particular program's intricacies (e.g., program size, multiple sites, number of rotators). Designating minimum FTEs ensures that program leadership have the minimum time to manage their program.
4	II.A.2	Associate/Assistant Program Directors (APDs) are vital to the education, supervision, evaluation, and mentoring of residents and fellows. As such, AAIM advises RC-IM define program leadership as including both PDs <b>and</b> APDs.
5	II.C.2	ACGME defines program coordinators (PCs) as a “ <b>key</b> member of the leadership team and is critical to the success of the program.” To that end, the Alliance strongly recommends that RC-IM designate a minimum of 0.5 FTE toward program administration.
6	II.C.2	In respect to ACGME’s stance that “programs with fewer residents may not require a full-time coordinator; one coordinator may support more than one program”, AAIM recommends that “all programs should have a dedicated coordinator since inequalities arise when coordinators are shared across multiple programs.” ( <i>AAIM Recommendation to ACGME’s Program Requirements Relating to GME Faculty and Staff Support</i> , September 10, 2020). Internal medicine is generally large; even its smaller programs are sizable compared to other disciplines. Nonetheless, adequate support of program coordinators ensures that members of program leadership (PDs and APDs) do not spend “an inordinate amount of time on program administration” and are able to accomplish other core responsibilities, including the time to “participate directly in clinical care.” In some circumstances, dividing a coordinator’s role could negatively impact program administration and resident/fellow education. For instance, a more dominant

	Requirement Number	Comment(s)/Rationale
		<p>program might detract a coordinator’s allocation of time and resources from another program. Additionally, there are times when tasks that are common to all programs overlap, such as WebADS, onboarding, and milestone reporting. This application can put tremendous strain on a single coordinator covering several programs. RC-IM should define its concept of a “smaller” program and further indicate that those institutions that intend to share a coordinator across multiple programs be prepared to describe their process for augmenting administrative support during predictably busier times in the GME cycle.</p>

**General Comments**

*Include only **general** or **overall** comments in this box. Comments about specific requirements must be included in the requirement comment table above and referenced by requirement number to be considered by the ACGME.*

Time and flexibility are essential for program leadership and coordinator support. AAIM advocates for each program to have dedicated personnel in each of the key leadership positions (PDs, APDs and PCs). If a smaller program shares a program coordinator, then workflows and safeguards must exist to avoid overtaxing these individuals during predictably busier times in the GME calendar. AAIM supports including these recommendations in the CPRs but understands that, should this not occur, our recommendations will be directed to the RC-IM.

**Submission**

All comments must be submitted via e-mail to [cprrevision@acgme.org](mailto:cprrevision@acgme.org) by March 31, 2021. Specific comments must reference the requirement(s) by number as described above. All comments must be submitted using this form; comments submitted in another format will not be considered.