August 18, 2014

Victor Dzau, MD  
President  
Institute of Medicine  
500 Fifth Street, NW  
Washington, DC  20001

Re: IOM Report on Graduate Medical Education

Dear Dr. Dzau,

Please accept my congratulations on your new position. We look forward to working with you as the IOM addresses many of the pressing issues in health care.

I'd like to comment on the recent IOM Report, “Graduate Medical Education That Meets the Nation’s Health Needs.” This topic is a critically important one from a variety of perspectives, and AAHC was pleased to co-sponsor the first Macy report on this topic.

The report was thoughtful and provocative. It forthrightly addressed the numerous complex and challenging issues surrounding GME and presented recommendations worthy of discussion and deliberation. I fully understand that the scope of the request for the IOM's GME report left many crucial issues outside the purview of the IOM’s consideration. But it is certainly clear that you and the IOM will have many opportunities to discuss the report as part of the ongoing health workforce debate. Therefore, it is important that the report be viewed in the broader framework of issues that reach beyond the boundaries of the report itself. To place my comments in perspective, I am enclosing the original and updated AAHC reports on the health care workforce.

It is essential that GME reform be considered in the context of national health workforce policy, not in isolation. A "GME solution," if there is one, is only a part of the issues that need attention. It is our view that GME reform needs to be addressed within the context of a comprehensive,
integrated, strategic national health workforce policy. As the IOM report noted, Congress has failed to fund the National Workforce Commission created by the ACA. This significantly undermines the likelihood that GME can be addressed appropriately to “meet the nation’s health care needs.”

For example, reaching consensus on the number of physicians, nurses, and other health providers that need to be trained to meet future health care needs is highly dependent on addressing obstacles to maximizing the efficiency and effectiveness of the health workforce we currently have. These pressing concerns include: dealing with licensure, accreditation, and scope-of-practice requirements that prevent health professionals from practicing to the full extent of their training and in an efficient fashion as part of health care teams; retraining current health professionals to assume new roles and responsibilities in a rapidly changing health care system; and creating mechanisms to reallocate health professionals and specialties from areas of surplus to areas of need.

As the IOM report notes, GME reform needs to be cognizant of fiscal realities and unintended consequences impacting both government and teaching institutions. While GME funding would be ideally spread across a broader financial base that could expand to meet future needs, AAHC is acutely aware of the limited resources available to support GME now and for the foreseeable future. A system redesign is necessary, but must be transitioned both carefully and incrementally, given the historical dependence of institutions on these monies. A full consideration of the financial burdens imposed by fiscal shifts is critical to avoid unintended consequences for these important institutions and the patients they serve. A carefully thought-out transition plan should be developed with the participation of those involved in the GME process to minimize the inevitable dislocations that will occur when scarce resources are rationalized and reallocated.

The IOM should be congratulated for its thoughtful contribution to this important, ongoing dialogue regarding graduate medical education. While the report is certainly reflective of some of the principles necessary for successful GME reform, its recommendations must ultimately be assessed in the wider context of the need for a comprehensive, integrated and strategic national health workforce policy. We look forward to contributing to this important discussion.

Sincerely,

Steven A. Wartman, MD, PhD, MACP
President and CEO

Enc: Out of Order, Out of Time
     Update: A Policy Framework
     Update: A Call to Action