

APCCMPD Comments - ACGME GME Subspeciality Program Requirements Focused Revisions Submitted October 17, 2021

Dedicated Time and Support Program Director and Associate Program Director

Pulmonary	ССМ	PCCM
Requirement #: II.A.2.a) and II.A.2.b) Requirement Revision (significant change only):	Requirement #: II.A.2.a) and II.A.2.b) Requirement Revision (significant change only):	Requirement #: II.A.2.a) and II.A.2.b) Requirement Revision (significant change only):
II.A.2.a) At a minimum, the program director must be provided with the dedicated time and support specified below for administration of the program. ^(Cover)	II.A.2.a) At a minimum, the program director must be provided with the dedicated time and support specified below for administration of the program; ^(Com)	II.A.2.a) At a minimum, the program director must be provided with the dedicated time and support specified below for administration of the program; "Comp
Number of Approved Fellow Positions Minimum Support Required (FTE) 57 2 7.9 .25 10-12 .3	Number of Approved Minimum Support Fellow Positions Required (FTE) -2 -2 7-9 -25 10-12 -3 13-15 -35 16-18 -4	Number of Approved Minimum Support Fellow Positions Required (FTE) 7 2 7.9 25 10-12 3 13-15 35 16-18 4 19-21 45
II.A.2.a) At a minimum, the program director must be provided with the salary support required to devote 20-50 percent FTE of non-clinical time to the administration of the program(^{clow})	$ \begin{array}{c ccccccccccccccccccccccccccccccccccc$	≥21 .5
IIA.2.b) Programs must appoint at least one of the subspecially-certified core faculty members to be associate program director(s). The associate program director(s) must be provided with support equal to a dedicated minimum time for administration of the program as follows: (cov) Image: subspace of the program as follows: (cov) Image: subspace of program (second) Specially-Specific Background and Intent: For instance, a program with an approved complement of 12 fellows is required to have at least 30 percent FTE support for the program director as instal 14 percent FTE support for the associate program director is also a sociate program director is also a core faculty member, the minimum dedicated time requirements for associate program director is also core faculty member, the minimum dedicated time requirements for associate program director is also a sociate program	II.A.2:a) At a minimum, the program director must be provided with the salary support required to devote 20-50 percent FTE of non-clinical line to the administration of the program: ^(Gwe) II.A.2.b) Programs must appoint at least one of the subspecially-certified core faculty members to be associate program director(s). The associate program director(s) must be provided with support equal to a dedicated minimum time for administration of the program as follows: ^(Gwe) II.A.2.b) Number of Approved Mumber of Approved Minimum Support 57.7 0 72 13 10-12 14	II-A:2:a) At a minimum, the program director must be provided with the salary support required to devote 20-60 percent FTE of non-clinical time to the administration of the program. ^{50xxy} I(A:2:b) Programs must appoint at least one of the subspecialty-certified core faculty members to be associate program director(s). The associate program director(s) must be provided with support equal to a dedicated minimum time for administration of the program as follows: ^(50xy) Image: State of the program director(s). The associate program director(s) is the program director(s). The provided with support equal to a dedicated minimum time for administration of the program as follows: ^(50xy) Image: State of the program director(s). The program director(s) is the program as follows: ^(50x) Image: State of the program director(s). The program director(s) is the program director(s). The state of the program as follows: ^(50x) Image: State of the program director(s). The program director(s). The state of the program as follows: ^(50x) Image: State of the program director(s). The program director(s) is the program director(s). The state of the program as follows: ^(50x) Image: State of the program director(s). The program director(s) is the program as follows: ^(50x) Image: State of the program director(s). The program director(s) is the program director(s) is the program director(s). The program director(s) is the program director(s) is the program director(s) is the program director(s). The program director(s) is the program director(s) is the program
core faculty activities. An additional 10 percent FTE for the core faculty position is not required. For example, if one core faculty member is named the associate program director for a 12-fellow program, the required minimum support for that position is 14 percent FTE. Further, the Review Committee allows the minimum required FTE support to be shared among multiple associate program directors, as delegated by and at the discretion of the program director.	$\begin{array}{c ccccccccccccccccccccccccccccccccccc$	21:24 18 25:27 24 28:30 30 31:33 .36 34:36 .42 37:38 .48
	Specialty-Specific Background and Intent: For instance, a program with an approved complement of 12 fellows is required to have at least 30 percent FTE support for the program director and talest 14 percent FTE support for the associate program director(s). Because an associate program director is also a core faculty member, the minimum dedicated time requirements for associate program metors are inclusive of core faculty activities. An additional 10 percent FTE for the core faculty position is not required. For example, if one core faculty member is named the associate program director for a 12-fellow program. Se required minimum support for that position is 14 percent FTE, Further, the Révex Committee allows the minimum director for the backback director and the standard for the second position is 14 percent FTE. Further, the Révex Committee allows the minimum director for the backback director and the second director for the second position is 14 percent FTE. Further, the Révex Committee allows the minimum director for the backback director for the second director for the format director for the second director for the second director for the second director for the second director for the format director for the second director for the second director for the format director for the second director director director for the second director for the second director for the second director d	Specialty-Specific Background and Int IM_PDs_ACGME_IMProgram1 complement of 12 fellows is required to program director and at least 14 percent director(s). Because an associate prostm director is also a core faculty member, the minimum dedicated time requirements for associate program directors are inclusive of core faculty activities. An additional 10 percent FTE for the core faculty member, the program director for a 12-fellow program, the requirement for subscience is ansociate program director for a 12-fellow program, the required minimum support for that position is 14 percent FTE. Further, the Review Committee allows the minimum required FTE support to be shared among multiple associate program directors. as deleaded by and at the discretion of the program director.
	required FTE support to be shared among multiple associate program directors, as delegated by and at the discretion of the program director.	

Please provide a rating for the	he changes to PR II.A.2.a)
I/We support the program	
requirement as written.	
I/We support the program requirement with suggested change. Please provide comment below.	The APCCMPD applauds the ACGME and the Internal Medicine Review Committee for recognizing the substantial support required to successfully administer a fellowship program; including, protecting the PD effort individually, as well as, the including support for an APD and core clinical faculty leadership.
	After review of the focused revisions and feedback from PCCM Programs Directors, especially from those with smaller programs, the APCCMPD would like to emphasize that Program Directors have many time consuming administrative responsibilities that they must perform regardless of number of fellows (webADS, CCC, PEC, annual program evaluation, etc.).
	As such, the APCCMPD recommends raising the base minimum support required for PDs. For example, programs with <7 fellows could start at .25.
I/We do not support this	
program requirement. Please	
provide comment below.	

Please provide a rating for the changes to PR II.A.2.b)	
I/We support the program	
requirement as written.	
I/We support the program	The APCCMPD applauds the ACGME and the Internal Medicine Review Committee for
requirement with	recognizing that successful fellowship education is dependent on dedicated support of

suggested change. Please provide comment below.	a variety fellowship program leadership, who possess diverse expertise, rather than just a single Program Director.
	After review of the focused revisions and feedback from PCCM Programs Directors the APCCMPD would like to emphasize that importance of multiple leaders supporting the fellowship program rather than a single Program Director.
	However, we are concerned that the requirement to appoint an APD for smaller programs without support will lead to difficulty/unfunded extra work for the person in that position. Therefore, the APCCMPD recommends that programs with < 7 fellows either have 0.13 FTE for an APD or the PD + APD could have a combination of support at some level (ie. $0.25 + 0.10 = 0.35$) that could be divided between 2 people accordingly. This would allow a greater flexibility to smaller programs to manage their educational personnel similar to larger programs that divide up their APD time.
I/We do not support this program requirement. Please provide comment below.	

Please provide a rating for the changes to the Specialty Specific Background and Intent language.	
I/We support the program requirement as written.	
I/We support the program requirement with suggested change. Please provide comment below.	
I/We do not support this program requirement. Please provide comment below.	

Dedicated Time and Support Additional Program Leadership Support

Pulmonary	ССМ	РССМ
Requirement #: II.B.4.e) Requirement Revision (significant change only):	Requirement #: II.B.4.e) Requirement Revision (significant change only):	Requirement #: II.B.4.e) Requirement Revision (significant change only):
II.B.4 At a minimum, each required core faculty member, excluding program leadership, must be provided with support equal to a dedicated minimum of .1 FTE for educational and administrative responsibilities that do not involve direct patient care, form	II.B.4.e) At a minimum, each required core faculty member, excluding program leadership, must be provided with support equal to a dedicated minimum of .1 ETE for educational and administrative responsibilities that do not involve direct patient care, local	II.B.4.e) At a minimum, each required core faculty member, excluding program leadership, must be provided with support equal to a dedicated minimum of .1 FTE for educational and administrative responsibilities that do not involve direct patient care, licent
Specialty-Specific Background and Intent. For instance, a program with an approved complement of 12 fellows is required to have a minimum of eight ABIM- or AOBIM-subspecialty-certified faculty members and an FTE of 10 percent each. Because an associate program director is also a core faculty member, the minimum dedicated time requirements for associate program directors are inclusive of core faculty activities. An additional 10 percent FTE for the core faculty position is not required. For example, if one core faculty member is named the associate program director for a 12-fellow program, the required minimum support for that position is 14 percent FTE.	Specially-Specific Background and Intent: For instance, a program with an approved complement of 12 fellows is required to have a minimum of eicht ABIM- or AOBIM-subspeciality-certified faculty members and an FTE of 10 percent each. Because an associate program director is also a core faculty member. The minimum dedicated time requirements for associate program directors are inclusive of core faculty activities. An additional 10 percent FTE for the core faculty position is not required. For example, if one core faculty member is mand the associate program director for a 12-fellow program, the required minimum support for that position is 14 percent FTE.	Specialty-Specific Background and Intent: For instance, a program with an approved complement of 12 fellows is required to have a minimum of eight ABIM- or AOBIM-subspecialty-certified faculty members and an FTE of 10 percent each. Because an associate program director is also a core faculty member, the minimum dedicated line requirements for associate program directors are inclusive of core faculty activities. An additional 10 percent FTE for the core faculty position is not required. For example, if one core faculty member is named the associate program director for a 12-fellow program. The required minimum support for that position is
Specially Background and Intent: The program must have a minimum number of ABIM-or AOBIM-certified pulmonary disease faulty members who devote significant time to teaching, supervising, and advising residents, and working closely with the program director. One way the pulmonary disease certified faulty most the program director. The way the pulmonary disease certified faulty message of the program of the control of the second second teaching resident education is by dedicating an average of 10 hours per week to the program.	Specially Background and Intent: The program must have a minimum number of ABIM-or AOBIM-contilied antical-care medicine faculty members who devote significant time to teaching, supervising, and advising residents, and working closely with the program director. One way the critical care medicine-contified faculty members can demonstrate they are devoting a significant portion of their effort. Is resident education is by dedicating an average of 10 hours per week to the program.	14 percent FTE. Specially Background and Intent: The program must have a minimum number of ABIM- or AOBIM certified ortical care medicine faculty members who devote significant time to teaching, supervising, and advising residents, and working closely with the program director-One way the critical care medicine-certified faculty members can demonstrate they are devoling a significant portion of their effort to resident education is by dedicating an average of 10 hours per week to the program.

Please provide a rating for the changes to PR II.B.4.e) / PR II.B.4.g) I/We support the program requirement as written.

I/We support the program requirement with suggested change. Please provide comment below. I/We do not support this program requirement. Please provide comment below.

Please provide a rating for	r the changes to the Specialty Specific Background and Intent language.
I/We support the program requirement as written.	
I/We support the program requirement with suggested change. Please provide comment below.	The APCCMPD applauds the ACGME and the and the Internal Medicine Review Committee for recognizing that successful fellowship education is dependent on dedicated support of a variety fellowship program faculty, who possess diverse expertise, rather than just a single Program Director and their leadership. The support of the core clinical faculty member to perform a host of teaching and administrative duties involved in the myriad of fellowship activities is a major advancement in in the support of fellowship education. Similar to PR II.A.2.b however we suggest that for some programs the ability to disperse that support in a more flexible way rather than a 0.1 per faculty may allow the PD the reward faculty who perform larger roles/activities than others (ie. Run QI curriculum etc). Therefore, the APCCMPD recommends that the total support for core clinical faculty be
	determined as 0.1×1.5 per approved fellow complement and then the PD be allowed to

	distribute that between their faculty according to their contributions (with a minimum of 0.05).
I/We do not support this program requirement. Please provide comment below.	

Dedicated Time and Support Program Coordinator Support

Pulmonary	CCM	PCCM
Requirement #: II.C.2.a)	Requirement #: II.C.2.a)	Requirement #: II.C.2.a)
Requirement Revision (significant change only):	Requirement Revision (significant change only):	Requirement Revision (significant change only):
II.C.2.a) At a minimum, the program coordinator must be provided with the dedicated time and support specified below for administration of the program. Additional administrative support must be provided based on the program size as follows: (Com)	II.C.2.a) At a minimum, the program coordinator must be provided with the dedicated time and support specified below for administration of the program. Additional administrative support must be provided based on the program size as follows: ^(Core)	ILC2.a) At a minimum, the program coordinator m support specified below for administration support must be provided based on the p 921_DRAFT-AG.docx
Number of Approved Minimum FTE Required Additional Aggregate FTE reglicev Positions Fellow Positions for Coordinator Support Required do Administration for Coordinator Support 7.3 .3 0 0 0 -4.6 .3 .3 .3 .4 .3 .2 .2 10-12 .3 .3 .38 .4 .3 .38 .4 .38 .38 .4 .38 .4 .38 .4 .38 .4 .38 .4 .38 .4 .38 .4 .38 .4 .38 .4 .38 .4 .38 .38 .4 .38 .4 .38 .38 .4 .38 .4 .38 .38 .4 .38 .4 .38 .4 .38 .38 .38 .38 .38 .4 .38 .4 .38 .4 .38 .4 .4 .38 .4 .38 .38 .38 .38 .38 .38 .38 .38 .38 </td <td>Number of Approved Fellow Positions Mir for 921_DRAFT-AG.docx 13 921_DRAFT-AG.docx 45 3 2 7.9 3 48 10-12 3 44 13-15 3 56 19-21 3 62 21-24 3 68 25-27 3 74 28-30 3 88 25-27 3 74 28-30 3 80 Specially-Specific Background and Intent: For instance, a program with an approved complement 012 fellows at least 74 percent FTE administrative support.130 percent FTE for the program coordinator and an additional 44 percent FTE accreate support. This additional support may be for the program coordinator only or divided among the program coordinator and one or incer other administrative personal. The Review Committee has not specified how the FTE should be distributed to allow programs, in patcership with their Spononion Institution, collocate the FTE as the use fit.</td> <td>Additional Agregate FTE Enlow Positions Additional Agregate FTE Enlow Positions 1.3 3 0 4.6 3 0 4.6 3 0 7.9 3 4 13.1 3 0 0 4.6 3 2 2 7.9 3 3 0 10.12 3 44 13.15 3 50 10.12 3 44 13.15 3 50 12.15 3 162 16.16 16.22 16.16 12.21 3 162 12.21 3 162 12.21 3 162 12.21 3 162 21.24 3 162 12.21 3 162 22.124 3 162 22.22 174 163 23.133 3 20 3 20 3 32 3 20</td>	Number of Approved Fellow Positions Mir for 921_DRAFT-AG.docx 13 921_DRAFT-AG.docx 45 3 2 7.9 3 48 10-12 3 44 13-15 3 56 19-21 3 62 21-24 3 68 25-27 3 74 28-30 3 88 25-27 3 74 28-30 3 80 Specially-Specific Background and Intent: For instance, a program with an approved complement 012 fellows at least 74 percent FTE administrative support.130 percent FTE for the program coordinator and an additional 44 percent FTE accreate support. This additional support may be for the program coordinator only or divided among the program coordinator and one or incer other administrative personal. The Review Committee has not specified how the FTE should be distributed to allow programs, in patcership with their Spononion Institution, collocate the FTE as the use fit.	Additional Agregate FTE Enlow Positions Additional Agregate FTE Enlow Positions 1.3 3 0 4.6 3 0 4.6 3 0 7.9 3 4 13.1 3 0 0 4.6 3 2 2 7.9 3 3 0 10.12 3 44 13.15 3 50 10.12 3 44 13.15 3 50 12.15 3 162 16.16 16.22 16.16 12.21 3 162 12.21 3 162 12.21 3 162 12.21 3 162 21.24 3 162 12.21 3 162 22.124 3 162 22.22 174 163 23.133 3 20 3 20 3 32 3 20

Please provide a rating for the changes to PR II.C.2.a)	
I/We support the program requirement as written.	
I/We support the program requirement with suggested change. Please provide comment below.	The APCCMPD applauds the ACGME and the Internal Medicine Review Committee for recognizing the support required to administer a fellowship program is dependent on a team of individuals with diverse expertise and skill sets. After review of the focused revisions and feedback from PCCM Programs Directors, especially from those with smaller programs, the APCCMPD would like to emphasize that like Program Directors, Program Coordinators have many time_consuming administrative responsibilities that they must perform regardless of number of fellows. As such, the APCCMPD recommends raising the for the minimum support required for Additional Aggregate FTE Required for Administration of the Program. For example, programs with <6 fellows could start at .2 FTE.
I/We do not support this program requirement. Please provide comment below.	

 Please provide a rating for the changes to the Specialty Specific Background and Intent language.

 I/We support the program requirement as written.
 I/We support the program requirement with suggested change. Please provide comment below.

 I/We do not support this program requirement. Please provide comment below.
 I/We support below.