

**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.

<b>Select [X] only one</b>	
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	Gabriel Bosslet, MD
Title	President (and Program Director for a Pulmonary Critical Care Medicine Fellowship)
Organization	Association of Pulmonary and Critical Care Medicine Program Directors

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.	<p>The APCCMPD applauds the revised CPR language to include applicable leadership team members, such as the Associate Program Director, in addition to the Program Director as individuals who must be supported to adequately administer the program. This language supports the growing importance of these individuals in fellowship programs, and their role in administrative and educational responsibilities, as well as, an individual program’s size and configuration.</p> <p>The APCCMPD further supports the direction to require each Resident Review Committee to further specify the minimum dedicated time and what constitutes program leadership for each specialty/sub specialty. We agree that guidance regarding specific dedicated time for program leadership naturally fits better within the specific program requirements, rather than the CPR.</p> <p>The APCCMPD looks forward to providing input to the IM-RRC as they are tasked with developing these specifications.</p>
2	II.B.4.b	<p>The APCCMPD supports the revised language of the CPR for Fellowships from “support” to “dedicated time” to better allow the RRC to account for variability across specialties and individual programs to determine how dedicated time of core faculty is provided. This language supports the growing importance of these individuals in fellowship programs, and their role in administrative and educational responsibilities.</p> <p>The APCCMPD looks forward to providing input to the IM-RRC as they are tasked with developing these specifications.</p>
3	II.C.2.	<p>The APCCMPD applauds the inclusion of “dedicated time” in addition to “support” for the program coordinator. The APCCMPD also agrees that dedicated time and support be based on an individual program’s size and configuration.</p> <p>The APCCMPD further supports the direction to move the specification of minimum dedicated time and support to the individual Resident Review Committees. Further, the APCCMPD applauds the revised language indicating that the Review Committee “must further specify” rather than “may further specify” the minimum dedicated time for the Program Coordinator. This supports the ACGME’s recognition that many individuals are required to adequately support the fellowship’s administrative and educational needs of trainees.</p> <p>The APCCMPD looks forward to providing input to the IM-RRC as they are tasked with developing these specifications.</p>

	Requirement Number	Comment(s)/Rationale
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5		
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**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.*

For the revised “Common Program Requirements for Fellowship” to be effective in July 2022 revisions to the “Specialty Specific Program Requirements” will be required. The APCCMPD feels the timeline to implement in July 2022 to be aggressive, given the time needed to propose revisions to the Specialty Specific Program Requirements and for the specialties/subspecialties to review, comment on, and make institutional preparations to implement. The APCCMPD recommends extending this implementation timeline.

**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.