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Association of  
American Medical Colleges  
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December 20, 2018

Ms. Lisa Wright-Solomon  
Information Collection Clearance Officer  
Health Resources and Services Administration  
Room 14N136B  
5600 Fishers Lane  
Rockville, MD 20857

***Re: Information Collection Request Title: Children's Graduate Medical Education Quality Bonus System (QBS) Initiative Response Form, OMB No. 0906-xxxx-New***

Dear Ms. Wright-Solomon:

The Association of American Medical Colleges (AAMC) welcomes this opportunity to comment on the "Agency Information Collection Request Title: Children's Graduate Medical Education Quality Bonus System (QBS) Initiative Response Form, OMB No. 0906-xxxx-New" 83 Fed. Reg. 53487 (October 23, 2018) issued by the Health Resources and Services Administration (HRSA).

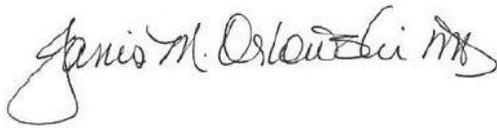
The AAMC is a not-for-profit association dedicated to transforming health care through innovative medical education, cutting-edge patient care, and groundbreaking medical research. Its members are all 152 accredited U.S. and 17 accredited Canadian medical schools; nearly 400 major teaching hospitals and health systems, including 51 Department of Veterans Affairs medical centers; and more than 80 academic societies. Through these institutions and organizations, the AAMC serves the leaders of America's medical schools and teaching hospitals and their more than 173,000 full-time faculty members, 89,000 medical students, 129,000 resident physicians, and more than 60,000 graduate students and postdoctoral researchers in the biomedical sciences.

The Notice seeks feedback on the estimated burden on hospitals to comply with the requirements of completing the Children's Graduate Medical Education (CHGME) QBS Response Initiative Form and submitting it as an attachment to the Fiscal Year (FY) 2019 reconciliation application released in April of 2019. HRSA defines burden in this context to be "the time expended by persons to generate, maintain, retain, disclose or provide the information requested." (83 FR 53488) However, nowhere in the notice does HRSA provide access to the form. In fact, it appears that the form may not be finalized given the OMB No. 0906-xxxx-[New]. (emphasis added). This notice says that hospitals will need to describe "the hospital's initiatives, resident curriculum, and direct resident involvement" in five areas. While this information can be submitted in narrative form, there is no indication as to the level of detail that will be acceptable. Therefore, it is impossible to assess the administrative burden of such a request. **This may be a very time-consuming exercise, but without access to the form and an understanding of the level of detail that is expected, it is impossible for a hospital to estimate the burden of compliance associated with the request outlined in the Notice. Therefore, the AAMC asks that HRSA release a copy of the QBS Response Initiative Form to allow hospitals an opportunity to determine the extent of the burden.**

Additionally, AAMC feels that HRSA should clarify that an Integrated Care Model is not limited to “integrated behavioral and mental health, care coordination across providers and settings” as stated in the Notice. (p. 53488) There are a variety of integrated care models that hospitals and residents participate in and it should be clear that these also will count toward the determination of the QBS.

Thank you for the opportunity to comment on this Notice. We would be happy to work with HRSA on any of the issues discussed above or other topics that involve the academic health center community. If you have questions regarding our comments, please feel free to contact Mary Mullaney at 202.909.2084 or [mmullaney@aamc.org](mailto:mmullaney@aamc.org).

Sincerely,

A handwritten signature in black ink that reads "Janis M. Orlowski M.D.". The signature is written in a cursive style with a large initial "J" and a stylized "M" at the end.

Janis M. Orlowski, M.D., M.A.C.P.  
Chief, Health Care Officer

cc: Ivy Baer