

REPORTS OF THE COUNCIL ON MEDICAL EDUCATION

The following six reports were presented by Jacqueline A. Bello, MD, Chair:

1. FOR-PROFIT MEDICAL SCHOOLS OR COLLEGES

Informational report; no reference committee hearing.

HOUSE ACTION: FILED

American Medical Association (AMA) Policy D-305.954, “For-Profit Medical Schools or Colleges,” states:

That our American Medical Association study issues related to medical education programs offered at for-profit versus not-for-profit medical schools, to include the: (1) attrition rate of students, (2) financial burden of non-graduates versus graduates, (3) success of graduates in obtaining a residency position, and (4) level of support for graduate medical education, and report back at the 2019 Annual Meeting.

The Council on Medical Education recognized the importance and timeliness of this topic and agreed that appropriate resources and data collection were needed to study this issue and prepare the report. However, meaningful and constructive review of this issue and the data collection required additional time. The Council therefore is presenting this report at the 2019 Interim Meeting.

For-profit medical schools are a rare phenomenon within the United States, and the numbers of these schools have not increased substantially, with only six for-profit U.S. medical schools. That said, there are a large and growing number of for-profit medical schools located in the Caribbean that are attended by U.S. citizens. This report focuses on for-profit medical schools located in the United States, and provides available attrition rates, general financial information associated with students who attend for-profit vs. not-for-profit medical schools, and data on student transition into residency programs. Very limited data are also included on for-profit medical schools located in the Caribbean, as such data are not publicly available.

BACKGROUND

In the 19th century, the majority of medical schools were the property of the faculty and, therefore, could be considered “for-profit.” In 1906, early accreditation standards from the Council on Medical Education required that schools not be conducted for the financial benefit of the faculty. A 1996 ruling against the American Bar Association, related to restraint of trade, opened up the possibility of accreditation of for-profit law schools and set a legal precedent for the establishment of for-profit medical schools.¹⁻³ Currently, medical school accreditation bodies, including the Liaison Committee on Medical Education (LCME) and American Osteopathic Association Commission on Osteopathic College Accreditation (COCA), are responsible for reviewing the financial status of U.S. medical schools and monitoring graduation rates and student debt.

Four for-profit osteopathic medical schools are in various stages of becoming accredited by COCA. In 2007, provisional accreditation was granted to investor-owned Rocky Vista University College of Osteopathic Medicine in Colorado.¹ The College was founded to address the need for community-based primary care physicians in the Mountain West region. The Burrell College of Osteopathic Medicine at New Mexico State University, a privately funded osteopathic medical school founded in 2013, holds pre-accreditation status from COCA, and is expected to be fully accredited when its first class graduates in 2020.⁴ In 2016, the Idaho College of Osteopathic Medicine and the California Health Sciences University College of Osteopathic Medicine were founded to help address regional physician shortages in underserved areas.⁵ Both schools have initiated the accreditation process with COCA.

The LCME, by comparison, has granted accreditation to two for-profit allopathic medical schools. In 2013, the LCME modified its standards to remove mention of “for-profit” in the accreditation of allopathic medical schools.¹ One year later, Ponce Health Sciences University School of Medicine (a 35-year-old not-for-profit institution in Puerto Rico reported to be in financial distress) was acquired by Arist Medical Sciences University, a for-profit public benefit corporation, making it the first for-profit allopathic medical school accredited by the LCME.¹ In 2015, California Northstate University College of Medicine, a private, for-profit medical school focused on educating, developing, and

training physicians to address the primary care physician shortage in northern California, gained preliminary accreditation from the LCME and enrolled its first class of students.⁶

FOR-PROFIT MEDICAL SCHOOLS IN THE CARIBBEAN

There is a growing number of for-profit medical schools located in the Caribbean, often referred to as “offshore medical schools.”⁷ Accreditation/approval of these schools is the purview of a variety of bodies, each with varying standards and requirements for quality and duration of education. Currently, 75 offshore medical schools are acceptable to the Educational Commission for Foreign Medical Graduates (ECFMG) for graduates to obtain ECFMG certification.⁸ Offshore schools typically engage in minimal clinical or scientific research. As a result, offshore proprietary schools have a profitable business model in that their costs are mainly related to the educational program. These schools use their tuition revenue to pay faculty to teach in the basic sciences at U.S. hospitals, and as part of their tuition third- and fourth-year medical students pay to take clinical rotations in the United States.

There are no summary data available on the enrollment of U.S. citizens in offshore medical schools. However, an estimate can be made based on the number of U.S. citizens pursuing certification by the ECFMG. Of the 9,430 ECFMG certificates issued in 2018, 2,398 (25.4 percent) were issued to U.S. citizen graduates of offshore medical schools.⁹ The students/graduates registering for certification were from medical schools located in countries in the Caribbean.

ATTRITION RATES

Not-for-profit U.S. Medical Schools

The Association of America Medical Colleges (AAMC) reports that from 1993-1994 through 2012-2013, the total national attrition rate for not-for-profit medical schools remained relatively stable at an average of 3.3 percent (Appendix A, Table 1).¹⁰ The AAMC notes that more medical students left medical school for nonacademic than for academic reasons, and that attrition rates appeared to vary by type of degree program—that is, the attrition rates of students in combined degree programs, such as MD-MPH programs, differ from those for students in MD programs.

The American Association of Colleges of Osteopathic Medicine (AACOM) calculates attrition rate by dividing the sum of students who withdrew or took a leave of absence by total enrollment. Withdrawals and dismissals are types of permanent attrition from the colleges of osteopathic medicine (COM), while leaves of absence are types of temporary attrition that may become a withdrawal or dismissal after a period of time.¹¹ Reasons for students’ withdrawals/dismissals include academic failure or school policy violation; poor academic standing; transferring to another medical school; medical or personal reasons; changes in career plans; and failure to take or pass COMLEX (per COM policy). Reasons for leaves of absence include poor academic performance/remediation; academic enrichment/research/study for another degree; medical or personal reasons; and failure to take or pass COMLEX (per COM policy). AACOM only reports on those schools with a full four-year enrollment.

Attrition rates for all COMs ranged from a low of 2.63 percent (2009-2010) to a high of 3.59 percent (2012-2013), with an average 3.03 percent attrition rate from 2009-2010 through 2018-2019 (Table 1).¹¹ AACOM reports that first- and third-year students had a higher rate of attrition than their second- and fourth-year counterparts, due largely to the struggles first-year students experience when adjusting to the rigors of medical school and to COMLEX being administered to third-year students.

For-profit Medical Schools

Ponce Health Sciences University School of Medicine reports on its website that its average attrition rate for 2016-2017 was 2.3 percent (Table 1).¹² Although actual attrition rates are not available for California Northstate University College of Medicine, the school’s website notes that a total of 60 new students enrolled in fall 2015, one student left the program, and three students fell back a year, with a total attrition of one student (1.7 percent).¹³ Rocky Vista University College of Osteopathic Medicine, the only COM that has a full class (four years of students enrolled), reports on its website that 91 percent of Title IV students complete the program within four years.¹⁴ Data on attrition rates for newer U.S. medical and osteopathic schools as well as offshore medical schools are not available.

FINANCIAL BURDEN

Not-for-profit U.S. Medical Schools

In 2018-2019, the median annual tuition and fees at state medical schools were \$38,202; at private medical schools the median cost was \$61,533 (Appendix B, Table 2).¹⁵ In 2019, for students who attended state medical schools, the median debt was \$190,000; for students who attended private medical schools, the median debt was \$210,000.¹⁵ The overall mean osteopathic medical education debt reported by academic year 2017-2018 graduates is \$254,953 (\$222,972 for public schools and \$261,133 for private schools).¹⁶

For-profit Medical Schools

The four-year estimated tuition, fees, and cost of attending a for-profit U.S. medical school can range from \$209,000 to \$342,000 (Table 2). Rocky Vista University College of Osteopathic Medicine reports that four-year estimated tuition, fees, and costs is \$215,748, and its typical graduate leaves with \$294,018 debt.¹⁷ Median student loan debt accrued for attending an offshore medical school ranges from \$191,500 (Ross University School of Medicine) to \$253,072 (American University of the Caribbean School of Medicine).⁷

SUCCESS OF U.S. GRADUATES IN OBTAINING A RESIDENCY POSITION

Not-for-profit U.S. Medical Schools

The National Resident Matching Program (NRMP) defines a successful match into a residency program as “one that is measured not just by volume, but also by how well it matches the preferences of applicants and program directors.”¹⁸ In 2019, U.S. allopathic medical school senior students comprised 18,925 of the active applicants, and the first-year post-graduate (PGY-1) Match rate for U.S. seniors was 93.9 percent.¹⁸

In 2019, the transition to a single accreditation system resulted in higher participation among students and graduates of U.S. osteopathic medical schools. An all-time high of 6,001 DO candidates submitted NRMP rank and order lists of programs, and the 84.6 percent PGY-1 match rate was the highest in history.¹⁸

Earlier Match data reflected NRMP and AOA National Matching Service (NMS) systems. Data reported by the COMs show that 98.7 percent of spring 2018 graduates seeking GME successfully placed into GME as of April 12, 2018.¹⁹ This represents 6,224 new physicians beginning their graduate medical education in July 2018.¹⁹ This compares to the 2017 match/placement process, when 5,898 new physicians entered GME (99.3 percent of graduates seeking GME) and 2016, when 5,356 graduates were successfully matched/placed—99.6 percent of graduates seeking to enter GME.¹⁹

The 2020 Match will be the first single match system administered by the NRMP, to include both allopathic and osteopathic residency programs. This single system will simplify the matching process for osteopathic medical school students. A result of the new process will be a shift in the way the Match rate percentage is reported.

For-profit Medical Schools

The California Northstate University College of Medicine class of 2019 had a 96.3 percent overall Match rate.²⁰ Rocky Vista University College of Osteopathic Medicine reported that the majority of students (79 percent) found a residency placement through the 2019 NRMP match, while other students matched into their top choices through the AOA Intern/Resident Registration Program (12 percent) or into military-specific residency programs (nine percent).²¹

However, fewer students matched into U.S. residency programs at some of the other for-profit schools. For example, Ponce Health Sciences University School of Medicine reported that its 2016-2017 initial residency Match rate (aside from the Supplemental Offer and Acceptance Program, or SOAP) was 89.4 percent, vs. 84.4 percent in 2017-2018.¹² In 2019, 5,080 U.S. IMGs (primarily graduates of offshore medical schools) participated in the NRMP, and 59 percent (n=2,997) successfully matched.¹⁸

LEVEL OF SUPPORT FOR GRADUATE MEDICAL EDUCATION

All U.S. allopathic and osteopathic medical schools are required to prepare their students to successfully transition into Accreditation Council for Graduate Medical Education (ACGME)-accredited GME programs. Two new for-profit osteopathic medical schools are in the process of developing their GME programs. Burrell College of Osteopathic Medicine at New Mexico State University has facilitated the ongoing development of new residency programs in family medicine, internal medicine, orthopaedic surgery, and osteopathic neuromusculoskeletal medicine, and additional new GME programs are under development.²² The leadership at the Idaho College of Osteopathic Medicine body is also focused on being able to provide its students with a high-quality academic and clinical clerkship experience and facilitating their placement into ACGME-accredited residency programs.²³

Concern has been raised about the paucity of academic teaching hospitals associated with some for-profit medical schools. For example, students who attend Rocky Vista University College of Osteopathic Medicine complete clinical rotations at various hospitals throughout the state of Colorado and the mountain west region.²⁴ Third- and fourth-year medical students in their clerkships could be sent for rotations to nonacademic community hospitals without a strong background in education and research.²⁴ Although the college was established on the premise that physicians practice in locations close to their residency or fellowship programs, many of the graduates have had to leave the state to complete residency training requirements.²⁴

Offshore for-profit medical schools, including those in the Caribbean, continue to provide a large number of medical school graduates who return to the United States for GME.²⁴ However, the accreditation standards these schools are held to, if any, vary widely and may not require that the schools provide career counseling or support for the transition of their students into ACGME-accredited programs.²⁵

RELEVANT AMA POLICY

The AMA has extensive policy related to the cost and financing of medical education.

Policy H-305.925 (20f), “Principles of and Actions to Address Medical Education Costs and Student Debt,” states that the costs of medical education should never be a barrier to the pursuit of a career in medicine nor to the decision to practice in a given specialty. To help address this issue related to the Public Service Loan Forgiveness (PSLF) Program, the AMA will advocate that the profit status of a trainee’s institution not be a factor for PSLF eligibility.

Policy H-200.949 (3), “Principles of and Actions to Address Primary Care Workforce,” directs the AMA, through its work with stakeholders, to encourage development and dissemination of innovative models to recruit medical students interested in primary care, train primary care physicians, and enhance both the perception and the reality of primary care practice, to encompass the following components: a) Changes to medical school admissions and recruitment of medical students to primary care specialties, including counseling of medical students as they develop their career plans; b) Curriculum changes throughout the medical education continuum; c) Expanded financial aid and debt relief options; d) Financial and logistical support for primary care practice, including adequate reimbursement, and enhancements to the practice environment to ensure professional satisfaction and practice sustainability; and e) Support for research and advocacy related to primary care.

Policy D-295.309, “Promoting and Reaffirming Domestic Medical School Clerkship Education,” directs the AMA to support agreements for clerkship rotations, where permissible, for U.S. citizen international medical students between foreign medical schools and teaching hospitals in regions that are medically underserved and/or that lack medical schools and clinical sites for training medical students, to maximize the cumulative clerkship experience for all students and to expose these students to the possibility of medical practice in these areas.

Additional related policies are provided in Appendix C.

SUMMARY

Stigma and reputational challenges associated with for-profit medical schools can be traced back to the 1910 Flexner Report on Medical Education in the United States and Canada, which called for quality education that linked medical schools with universities and teaching hospitals.³ The report criticized for-profit schools, and the subsequent linkage between accreditation and licensure requirements led to the collapse of many proprietary medical schools. However,

for-profit medical education has reemerged in the United States and has expanded in the Caribbean and elsewhere around the world.^{7,24} The Ponce Health Sciences University School of Medicine was recently incorporated to facilitate the retention of public benefit.¹

For-profit schools are based on a tuition-dependent business model. For example, at Rocky Vista University College of Medicine approximately 80 percent of revenue, as with the other private osteopathic medical schools, comes from tuition and fees. In contrast, tuition and fees constitute only 14 percent of public osteopathic medical schools' revenues.²⁴

As with any medical school, for-profit medical schools may have a positive impact on the physician workforce. For example, the mission of California Northstate University College of Medicine is to train primary care physicians to serve the needs in underserved areas in northern California. As with other medical schools, however, the graduates of U.S. for-profit medical schools are subject to competition for residency placements. Graduates from for-profit medical schools in the Caribbean need to complete the requirements for ECFMG certification before they can apply for residency training in the United States.

Through its Council on Medical Education, the AMA will continue to monitor the development of for-profit medical schools, both allopathic and osteopathic, and report back to the House of Delegates as needed.

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APPENDIX A - Table 1. Attrition rate of students attending U.S. medical schools

Not-for-profit	Attrition Rate:
U.S. allopathic medical schools	From 1993-1994 through 2012-2013, the total national attrition rate remained relatively stable at an average of 3.3% ¹
U.S. osteopathic medical schools	From a low of 2.63% (2009-10) to a high of 3.59% (2012-13), with an average of 3.03% attrition rate from 2009-10 through 2018-19. ²
For-profit*	Attrition Rate:
Ponce Health Sciences University School of Medicine	Average attrition rate is 2.3%; retention rate is 97.7% (2016-2017) ³
California Northstate University College of Medicine**	Total of 60 new students enrolled in the Fall of 2015: one student left the program and three students fell back a year; the total attrition of 1 student (1.7%). ⁴
Rocky Vista University College of Osteopathic Medicine**	91% of Title IV students complete the program within 4 years with an attrition rate of 9%. ⁵
Burrell College of Osteopathic Medicine at New Mexico State University**	Matriculated 162 students in 2018; retained 154 (95.06%) with an attrition rate of 4.94%. ⁶
Idaho College of Osteopathic Medicine***	Matriculated its inaugural class in August 2018. This class of 2022 is composed of graduates from 97 U.S. colleges and universities, with above average composite medical board (MCAT) scores and highly competitive undergraduate grade point averages. ⁷
California Health Sciences University College of Osteopathic Medicine***	Campus construction underway with targeted completion date of Spring 2020.

* Similar quality data are not available from offshore medical schools

** Attrition rate is extrapolated from the retention rate posted on the medical school's website.

*** Data on attrition rates for newer U.S. medical schools are not yet available.

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Appendix B - Table 2. Financial burden of non-graduates versus graduates of U.S. medical schools

Not-for-profit	Financial Burden
U.S. allopathic medical schools	In 2018-2019, the median annual tuition and fees at state medical schools were \$38,202; at private medical schools the median cost was \$61,533. ⁶ In 2019, for students who attended state medical schools the median debt was \$190,000; for students who attended private medical schools the median debt was \$210,000. ¹
U.S. osteopathic medical schools	The overall mean osteopathic medical education debt reported for academic year 2017-2018 graduates is \$254,953 (\$222,972 for public schools and \$261,133 for private schools). ²
For-profit*	Financial Burden
Ponce Health Sciences University School of Medicine	4-year estimated tuition, fees and costs range from \$233,456 to \$342,069. ³
California Northstate University College of Medicine	4-year estimated tuition, fees, and costs range from \$240,000 to \$255,000. ⁴
Rocky Vista University College of Osteopathic Medicine	4-year estimated tuition, fees, and cost are \$215,748; typical graduate leaves with \$294,018 in debt. ⁵
Burrell College of Osteopathic Medicine at New Mexico State University**	2018-2019 annual cost of attendance is \$80,165. ⁶
Idaho College of Osteopathic Medicine**	2018-2019 academic year annual tuition is \$49,750 plus \$2,500 in fees. ⁷
California Health Sciences University College of Osteopathic Medicine**	Fall 2020 enrollment annual cost of tuition is \$53,500. ⁸

*Data not available from offshore medical schools

**Data on student debt for newer U.S. medical schools are not yet available

1. Medical Student Education: Debt, Costs, and Loan Repayment Fact Card. Association of American Medical Colleges. Available at: https://store.aamc.org/downloadable/download/sample_id/240/ (Accessed July 2, 2019).
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APPENDIX C - AMA Policy

D-305.954, “For-Profit Medical Schools or Colleges”

Our AMA will study issues related to medical education programs offered at for-profit versus not-for-profit medical schools, to include the: (a) attrition rate of students; (b) financial burden of non-graduates versus graduates; (c) success of graduates in obtaining a residency position; and (d) level of support for graduate medical education; and report back at the 2019 Annual Meeting. (Res. 302, A-18)

H-305.988, “Cost and Financing of Medical Education and Availability of First-Year Residency Positions”

Our AMA:

1. believes that medical schools should further develop an information system based on common definitions to display the costs associated with undergraduate medical education;
2. in studying the financing of medical schools, supports identification of those elements that have implications for the supply of physicians in the future;

3. believes that the primary goal of medical school is to educate students to become physicians and that despite the economies necessary to survive in an era of decreased funding, teaching functions must be maintained even if other commitments need to be reduced;
4. believes that a decrease in student enrollment in medical schools may not result in proportionate reduction of expenditures by the school if quality of education is to be maintained;
5. supports continued improvement of the AMA information system on expenditures of medical students to determine which items are included, and what the ranges of costs are;
6. supports continued study of the relationship between medical student indebtedness and career choice;
7. believes medical schools should avoid counterbalancing reductions in revenues from other sources through tuition and student fee increases that compromise their ability to attract students from diverse backgrounds;
8. supports expansion of the number of affiliations with appropriate hospitals by institutions with accredited residency programs;
9. encourages for profit-hospitals to participate in medical education and training;
10. supports AMA monitoring of trends that may lead to a reduction in compensation and benefits provided to resident physicians;
11. encourages all sponsoring institutions to make financial information available to help residents manage their educational indebtedness; and
12. will advocate that resident and fellow trainees should not be financially responsible for their training.

(CME Rep. A, I-83 Reaffirmed: CLRPD Rep. 1, I-93 Res. 313, I-95 Reaffirmed by CME Rep. 13, A-97 Modified: CME Rep. 7, A-05 Modified: CME Rep. 13, A-06 Appended: Res. 321, A-15 Reaffirmed: CME Rep. 05, A-16 Modified: CME Rep. 04, A-16)

H-305.925, "Principles of and Actions to Address Medical Education Costs and Student Debt"

The costs of medical education should never be a barrier to the pursuit of a career in medicine nor to the decision to practice in a given specialty. To help address this issue, our American Medical Association (AMA) will:

1. Collaborate with members of the Federation and the medical education community, and with other interested organizations, to address the cost of medical education and medical student debt through public- and private-sector advocacy.
2. Vigorously advocate for and support expansion of and adequate funding for federal scholarship and loan repayment programs such as those from the National Health Service Corps, Indian Health Service, Armed Forces, and Department of Veterans Affairs, and for comparable programs from states and the private sector to promote practice in underserved areas, the military, and academic medicine or clinical research.
3. Encourage the expansion of National Institutes of Health programs that provide loan repayment in exchange for a commitment to conduct targeted research.
4. Advocate for increased funding for the National Health Service Corps Loan Repayment Program to assure adequate funding of primary care within the National Health Service Corps, as well as to permit: (a) inclusion of all medical specialties in need, and (b) service in clinical settings that care for the underserved but are not necessarily located in health professions shortage areas.
5. Encourage the National Health Service Corps to have repayment policies that are consistent with other federal loan forgiveness programs, thereby decreasing the amount of loans in default and increasing the number of physicians practicing in underserved areas.
6. Work to reinstate the economic hardship deferment qualification criterion known as the 20/220 pathway, and support alternate mechanisms that better address the financial needs of trainees with educational debt.
7. Advocate for federal legislation to support the creation of student loan savings accounts that allow for pre-tax dollars to be used to pay for student loans.
8. Work with other concerned organizations to advocate for legislation and regulation that would result in favorable terms and conditions for borrowing and for loan repayment, and would permit 100% tax deductibility of interest on student loans and elimination of taxes on aid from service-based programs.
9. Encourage the creation of private-sector financial aid programs with favorable interest rates or service obligations (such as community- or institution-based loan repayment programs or state medical society loan programs).
10. Support stable funding for medical education programs to limit excessive tuition increases, and collect and disseminate information on medical school programs that cap medical education debt, including the types of debt management education that are provided.
11. Work with state medical societies to advocate for the creation of either tuition caps or, if caps are not feasible, pre-defined tuition increases, so that medical students will be aware of their tuition and fee costs for the total period of their enrollment.
12. Encourage medical schools to (a) Study the costs and benefits associated with non-traditional instructional formats (such as online and distance learning, and combined baccalaureate/MD or DO programs) to determine if cost savings to medical schools and to medical students could be realized without jeopardizing the quality of medical education; (b) Engage in fundraising activities to increase the availability of scholarship support, with the support of the Federation, medical schools, and state and specialty medical societies, and develop or enhance financial aid opportunities for medical students, such as self-managed, low-interest loan programs; (c) Cooperate with postsecondary institutions to establish collaborative debt counseling for entering first-year medical students; (d) Allow for flexible scheduling for medical students who encounter financial difficulties that can be remedied only by employment, and consider creating opportunities for paid employment for medical students; (e) Counsel individual medical student borrowers on the status of their indebtedness and payment schedules prior to their graduation; (f) Inform students of all government loan opportunities and disclose the reasons that preferred lenders were chosen; (g) Ensure that all medical student fees are earmarked for specific and well-defined purposes, and avoid charging any overly broad and ill-defined fees, such as but not limited to professional fees; (h) Use their collective purchasing power to obtain discounts for their students on necessary medical equipment, textbooks, and other educational supplies; (i) Work to ensure stable funding, to eliminate the need for increases in

tuition and fees to compensate for unanticipated decreases in other sources of revenue; mid-year and retroactive tuition increases should be opposed.

13. Support and encourage state medical societies to support further expansion of state loan repayment programs, particularly those that encompass physicians in non-primary care specialties.

14. Take an active advocacy role during reauthorization of the Higher Education Act and similar legislation, to achieve the following goals: (a) Eliminating the single holder rule; (b) Making the availability of loan deferment more flexible, including broadening the definition of economic hardship and expanding the period for loan deferment to include the entire length of residency and fellowship training; (c) Retaining the option of loan forbearance for residents ineligible for loan deferment; (d) Including, explicitly, dependent care expenses in the definition of the cost of attendance; (e) Including room and board expenses in the definition of tax-exempt scholarship income; (f) Continuing the federal Direct Loan Consolidation program, including the ability to lock in a fixed interest rate, and giving consideration to grace periods in renewals of federal loan programs; (g) Adding the ability to refinance Federal Consolidation Loans; (h) Eliminating the cap on the student loan interest deduction; (i) Increasing the income limits for taking the interest deduction; (j) Making permanent the education tax incentives that our AMA successfully lobbied for as part of Economic Growth and Tax Relief Reconciliation Act of 2001; (k) Ensuring that loan repayment programs do not place greater burdens upon married couples than for similarly situated couples who are cohabitating; (l) Increasing efforts to collect overdue debts from the present medical student loan programs in a manner that would not interfere with the provision of future loan funds to medical students.

15. Continue to work with state and county medical societies to advocate for adequate levels of medical school funding and to oppose legislative or regulatory provisions that would result in significant or unplanned tuition increases.

16. Continue to study medical education financing, so as to identify long-term strategies to mitigate the debt burden of medical students, and monitor the short-and long-term impact of the economic environment on the availability of institutional and external sources of financial aid for medical students, as well as on choice of specialty and practice location.

17. Collect and disseminate information on successful strategies used by medical schools to cap or reduce tuition.

18. Continue to monitor the availability of and encourage medical schools and residency/fellowship programs to (a) provide financial aid opportunities and financial planning/debt management counseling to medical students and resident/fellow physicians; (b) work with key stakeholders to develop and disseminate standardized information on these topics for use by medical students, resident/fellow physicians, and young physicians; and (c) share innovative approaches with the medical education community.

19. Seek federal legislation or rule changes that would stop Medicare and Medicaid decertification of physicians due to unpaid student loan debt. The AMA believes that it is improper for physicians not to repay their educational loans, but assistance should be available to those physicians who are experiencing hardship in meeting their obligations.

20. Related to the Public Service Loan Forgiveness (PSLF) Program, our AMA supports increased medical student and physician benefits the program, and will: (a) Advocate that all resident/fellow physicians have access to PSLF during their training years; (b) Advocate against a monetary cap on PSLF and other federal loan forgiveness programs; (c) Work with the United States Department of Education to ensure that any cap on loan forgiveness under PSLF be at least equal to the principal amount borrowed; (d) Ask the United States Department of Education to include all terms of PSLF in the contractual obligations of the Master Promissory Note; (e) Encourage the Accreditation Council for Graduate Medical Education (ACGME) to require residency/fellowship programs to include within the terms, conditions, and benefits of program appointment information on the PSLF program qualifying status of the employer; (f) Advocate that the profit status of a physician's training institution not be a factor for PSLF eligibility; (g) Encourage medical school financial advisors to counsel wise borrowing by medical students, in the event that the PSLF program is eliminated or severely curtailed; (h) Encourage medical school financial advisors to increase medical student engagement in service-based loan repayment options, and other federal and military programs, as an attractive alternative to the PSLF in terms of financial prospects as well as providing the opportunity to provide care in medically underserved areas; (i) Strongly advocate that the terms of the PSLF that existed at the time of the agreement remain unchanged for any program participant in the event of any future restrictive changes.

21. Advocate for continued funding of programs including Income-Driven Repayment plans for the benefit of reducing medical student load burden.

(CME Report 05, I-18 Appended: Res. 953, I-18 Reaffirmation: A-19)

H-200.949, "Principles of and Actions to Address Primary Care Workforce"

1. Our patients require a sufficient, well-trained supply of primary care physicians--family physicians, general internists, general pediatricians, and obstetricians/gynecologists--to meet the nation's current and projected demand for health care services.

2. To help accomplish this critical goal, our American Medical Association (AMA) will work with a variety of key stakeholders, to include federal and state legislators and regulatory bodies; national and state specialty societies and medical associations, including those representing primary care fields; and accreditation, certification, licensing, and regulatory bodies from across the continuum of medical education (undergraduate, graduate, and continuing medical education).

3. Through its work with these stakeholders, our AMA will encourage development and dissemination of innovative models to recruit medical students interested in primary care, train primary care physicians, and enhance both the perception and the reality of primary care practice, to encompass the following components: a) Changes to medical school admissions and recruitment of medical students to primary care specialties, including counseling of medical students as they develop their career plans; b) Curriculum changes throughout the medical education continuum; c) Expanded financial aid and debt relief options; d) Financial and logistical support for primary care practice, including adequate reimbursement, and enhancements to the practice environment to ensure professional satisfaction and practice sustainability; and e) Support for research and advocacy related to primary care.

4. Admissions and recruitment: The medical school admissions process should reflect the specific institution's mission. Those schools with missions that include primary care should consider those predictor variables among applicants that are associated with choice of these specialties.
5. Medical schools, through continued and expanded recruitment and outreach activities into secondary schools, colleges, and universities, should develop and increase the pool of applicants likely to practice primary care by seeking out those students whose profiles indicate a likelihood of practicing in primary care and underserved areas, while establishing strict guidelines to preclude discrimination.
6. Career counseling and exposure to primary care: Medical schools should provide to students career counseling related to the choice of a primary care specialty, and ensure that primary care physicians are well-represented as teachers, mentors, and role models to future physicians.
7. Financial assistance programs should be created to provide students with primary care experiences in ambulatory settings, especially in underserved areas. These could include funded preceptorships or summer work/study opportunities.
8. Curriculum: Voluntary efforts to develop and expand both undergraduate and graduate medical education programs to educate primary care physicians in increasing numbers should be continued. The establishment of appropriate administrative units for all primary care specialties should be encouraged.
9. Medical schools with an explicit commitment to primary care should structure the curriculum to support this objective. At the same time, all medical schools should be encouraged to continue to change their curriculum to put more emphasis on primary care.
10. All four years of the curriculum in every medical school should provide primary care experiences for all students, to feature increasing levels of student responsibility and use of ambulatory and community-based settings.
11. Federal funding, without coercive terms, should be available to institutions needing financial support to expand resources for both undergraduate and graduate medical education programs designed to increase the number of primary care physicians. Our AMA will advocate for public (federal and state) and private payers to a) develop enhanced funding and related incentives from all sources to provide education for medical students and resident/fellow physicians, respectively, in progressive, community-based models of integrated care focused on quality and outcomes (such as the patient-centered medical home and the chronic care model) to enhance primary care as a career choice; b) fund and foster innovative pilot programs that change the current approaches to primary care in undergraduate and graduate medical education, especially in urban and rural underserved areas; and c) evaluate these efforts for their effectiveness in increasing the number of students choosing primary care careers and helping facilitate the elimination of geographic, racial, and other health care disparities.
12. Medical schools and teaching hospitals in underserved areas should promote medical student and resident/fellow physician rotations through local family health clinics for the underserved, with financial assistance to the clinics to compensate their teaching efforts.
13. The curriculum in primary care residency programs and training sites should be consistent with the objective of training generalist physicians. Our AMA will encourage the Accreditation Council for Graduate Medical Education to (a) support primary care residency programs, including community hospital-based programs, and (b) develop an accreditation environment and novel pathways that promote innovations in graduate medical education, using progressive, community-based models of integrated care focused on quality and outcomes (such as the patient-centered medical home and the chronic care model).
14. The visibility of primary care faculty members should be enhanced within the medical school, and positive attitudes toward primary care among all faculty members should be encouraged.
15. Support for practicing primary care physicians: Administrative support mechanisms should be developed to assist primary care physicians in the logistics of their practices, along with enhanced efforts to reduce administrative activities unrelated to patient care, to help ensure professional satisfaction and practice sustainability.
16. There should be increased financial incentives for physicians practicing primary care, especially those in rural and urban underserved areas, to include scholarship or loan repayment programs, relief of professional liability burdens, and Medicaid case management programs, among others. Our AMA will advocate to state and federal legislative and regulatory bodies, among others, for development of public and/or private incentive programs, and expansion and increased funding for existing programs, to further encourage practice in underserved areas and decrease the debt load of primary care physicians. The imposition of specific outcome targets should be resisted, especially in the absence of additional support to the schools.
17. Our AMA will continue to advocate, in collaboration with relevant specialty societies, for the recommendations from the AMA/Specialty Society RVS Update Committee (RUC) related to reimbursement for E&M services and coverage of services related to care coordination, including patient education, counseling, team meetings and other functions; and work to ensure that private payers fully recognize the value of E&M services, incorporating the RUC-recommended increases adopted for the most current Medicare RBRVS.
18. Our AMA will advocate for public (federal and state) and private payers to develop physician reimbursement systems to promote primary care and specialty practices in progressive, community-based models of integrated care focused on quality and outcomes such as the patient-centered medical home and the chronic care model consistent with current AMA Policies H-160.918 and H-160.919.
19. There should be educational support systems for primary care physicians, especially those practicing in underserved areas.
20. Our AMA will urge urban hospitals, medical centers, state medical associations, and specialty societies to consider the expanded use of mobile health care capabilities.
21. Our AMA will encourage the Centers for Medicare & Medicaid Services to explore the use of telemedicine to improve access to and support for urban primary care practices in underserved settings.
22. Accredited continuing medical education providers should promote and establish continuing medical education courses in performing, prescribing, interpreting and reinforcing primary care services.

23. Practicing physicians in other specialties--particularly those practicing in underserved urban or rural areas--should be provided the opportunity to gain specific primary care competencies through short-term preceptorships or postgraduate fellowships offered by departments of family medicine, internal medicine, pediatrics, etc., at medical schools or teaching hospitals. In addition, part-time training should be encouraged, to allow physicians in these programs to practice concurrently, and further research into these concepts should be encouraged.

24. Our AMA supports continued funding of Public Health Service Act, Title VII, Section 747, and encourages advocacy in this regard by AMA members and the public.

25. Research: Analysis of state and federal financial assistance programs should be undertaken, to determine if these programs are having the desired workforce effects, particularly for students from disadvantaged groups and those that are underrepresented in medicine, and to gauge the impact of these programs on elimination of geographic, racial, and other health care disparities. Additional research should identify the factors that deter students and physicians from choosing and remaining in primary care disciplines. Further, our AMA should continue to monitor trends in the choice of a primary care specialty and the availability of primary care graduate medical education positions. The results of these and related research endeavors should support and further refine AMA policy to enhance primary care as a career choice.

(CME Rep. 04, I-18)

D-295.309, "Promoting and Reaffirming Domestic Medical School Clerkship Education"

1. Our American Medical Association:

A. Will work with the Association of American Medical Colleges, American Association of Colleges of Osteopathic Medicine, and other interested stakeholders to encourage local and state governments and the federal government, as well as private sector philanthropies, to provide additional funding to support: (1) infrastructure and faculty development and capacity for medical school expansion; and (2) delivery of clinical clerkships and other educational experiences.

B. Encourages clinical clerkship sites for medical education (to include medical schools and teaching hospitals) to collaborate with local, state, and regional partners to create additional clinical education sites and resources for students.

C. Advocates for federal and state legislation/regulations to: (1) Oppose any extraordinary compensation granted to clinical clerkship sites that would displace or otherwise limit the education/training opportunities for medical students in clinical rotations enrolled in medical school programs accredited by the Liaison Committee on Medical Education (LCME) or Commission on Osteopathic College Accreditation (COCA); (2) Ensure that priority for clinical clerkship slots be given first to students of LCME- or COCA-accredited medical school programs; and (3) Require that any institution that accepts students for clinical placements ensure that all such students are trained in programs that meet requirements for educational quality, curriculum, clinical experiences and attending supervision that are equivalent to those of programs accredited by the LCME and COCA.

D. Encourages relevant stakeholders to study whether the public service community benefit commitment and corporate purposes of not for profit, tax exempt hospitals impose any legal and/or ethical obligations for granting priority access for teaching purposes to medical students from medical schools in their service area communities and, if so, advocate for the development of appropriate regulations at the state level.

E. Will work with interested state and specialty medical associations to pursue legislation that ensures the quality and availability of medical student clerkship positions for U.S. medical students.

2. Our AMA supports the practice of U.S. teaching hospitals and foreign medical schools entering into appropriate relationships directed toward providing clinical educational experiences for advanced medical students who have completed the equivalent of U.S. core clinical clerkships. Policies governing the accreditation of U.S. medical education programs specify that core clinical training be provided by the parent medical school; consequently, the AMA strongly objects to the practice of substituting clinical experiences provided by U.S. institutions for core clinical curriculum of foreign medical schools. Moreover, it strongly disapproves of the placement of medical students in teaching hospitals and other clinical sites that lack appropriate educational resources and experience for supervised teaching of clinical medicine, especially when the presence of visiting students would disadvantage the institution's own students educationally and/or financially and negatively affect the quality of the educational program and/or safety of patients receiving care at these sites.

3. Our AMA supports agreements for clerkship rotations, where permissible, for U.S. citizen international medical students between foreign medical schools and teaching hospitals in regions that are medically underserved and/or that lack medical schools and clinical sites for training medical students, to maximize the cumulative clerkship experience for all students and to expose these students to the possibility of medical practice in these areas.

4. AMA policy is that U.S. citizens should have access to factual information on the requirements for licensure and for reciprocity in the various U.S. medical licensing jurisdictions, prerequisites for entry into graduate medical education programs, and other relevant factors that should be considered before deciding to undertake the study of medicine in schools not accredited by the LCME or COCA.

5. AMA policy is that existing requirements for foreign medical schools seeking Title IV Funding should be applied to those schools that are currently exempt from these requirements, thus creating equal standards for all foreign medical schools seeking Title IV Funding.

(CME Rep. 01, I-17)

**2. HEALTHCARE FINANCE IN THE MEDICAL SCHOOL CURRICULUM
(RESOLUTION 307-A-18)**

Reference committee hearing: see report of Reference Committee C.

**HOUSE ACTION: RECOMMENDATIONS ADOPTED
IN LIEU OF RESOLUTION 307-A-18 AND RESOLUTION 307
REMAINDER OF REPORT FILED**
See Policy H-295.924

INTRODUCTION

Resolution 307-A-18, “Healthcare Finance in the Medical School Curriculum,” introduced by the Missouri Delegation and referred by the American Medical Association (AMA) House of Delegates (HOD), asks that the AMA “study the extent to which medical schools and residency programs are teaching topics of healthcare finance and medical economics” and “make a formal suggestion to the Liaison Committee on Medical Education encouraging the addition of a new Element, 7.10, under Standard 7, ‘Curricular Content,’ that would specifically address the role of healthcare finance and medical economics in undergraduate medical education.”

During the 2018 Annual Meeting, Reference Committee C heard mixed testimony on this item. It was noted that health care finance is already being taught in some medical schools, but an overall understanding of the breadth, depth, and frequency of these offerings is unknown. Furthermore, concern was expressed that the second Resolve implied a curricular mandate in an already distended medical education curriculum. The reference committee believed that additional study was warranted; the HOD agreed, and this item was referred. This report addresses that referral.

BACKGROUND AND DATA

The United States spends more on health care than any other nation in the world, with health care expenditures at 17.9 percent of gross domestic product in 2017, and national health care spending is projected to increase at a rate of 5.5 percent per year for the next 10 years under current law. Multiple factors contribute to the high cost of health care in the United States, including costs for labor and goods, pharmaceutical costs, administrative costs.^{1,2,3} Numerous studies have found that while cost of care in the U.S. is often double that of other industrialized countries, outcome measures are essentially the same. In recognition of this concern, reducing cost of care is one of the Triple Aims of the Institute for Health Care Improvement and one of the three core aims of health care reform.⁴

The medical education system has been shown to favorably impact cost of care by medical school graduates who have had cost, financing, and medical economics topics integrated into their respective program curricula. Chen et al.⁵ found that the spending pattern of the training location was positively associated with care expenditures when the residents entered practice, implying that interventions in training may have the potential to reduce health care spending after completion of training. Phillips et al.⁶ similarly found that family physician and general internist spending was influenced by location of training in low, average, or high-cost locations, and concluded, “The ‘imprint’ of training spending patterns on physicians is strong and enduring, without discernible quality effects...” Stammen et al.⁷ in a published systematic review on the effectiveness of medical education on high-value, cost-conscious care, reached the following conclusion:

... learning by practicing physicians, resident physicians, and medical students is promoted by combining specific knowledge transmission, reflective practice, and a supportive environment. These factors should be considered when educational interventions are being developed.

Curriculum content in health care financing is currently required by the accrediting body for allopathic medical schools in the United States, the Liaison Committee on Medical Education (LCME). The LCME’s accreditation *Standard 7: Curricular Content* requires that “the medical school curriculum provides content of sufficient breadth and depth to prepare medical students for entry into any residency program and for the subsequent contemporary practice of medicine.” This requirement is expressed through *Element 7.1: Biomedical, Behavioral, and Social Sciences* by ensuring that “the medical curriculum includes content from biomedical, behavioral, and socioeconomic sciences to support medical students’ mastery of contemporary scientific knowledge and concepts and the methods fundamental to applying them to the health of individuals and populations.”⁸ As part of their accreditation documents, schools are

asked to document where in the curriculum health care financing is taught (preclinical or clinical phases), but schools are not asked to comment on the content or quantity of the subject matter. The quality of instruction and educational materials is not evaluated. No inquiries are made regarding medical economics.⁹

Unrelated to the accreditation process, each year the LCME requests that schools complete a voluntary survey, the LCME Annual Medical School Questionnaire Part II. The questionnaire includes queries on where in the curriculum certain topics are taught. Data relevant to this report from academic years 2013-14 through 2017-18 are provided in the tables below.

Health Care Financing [*] /Cost of Care [#]					
Survey year	Total number of schools surveyed	Location in curriculum			
		Required Course	Elective	Pre-clerkship	Clerkships
2017-18*	147	131	63	120	89
2016-17 [#]	145	140	72	128	97
2015-16 [#]	142	137	67	120	125
2014-15*	141	140	61	127	112
2014-15 [#]	141	139	84	120	112
2013-14*	140	133	64	120	108
2013-14 [#]	140	129	53	112	103

* Survey item was “health care financing”

Survey question was “cost of care”

2013-14 and 2014-15 surveys included both terms

Medical Socioeconomics [*] /Medical Economics [#]					
Survey year	Total number of schools surveyed	Location in curriculum			
		Required Course	Elective	Pre-clerkship	Clerkships
2017-18*	147	143	79	141	117
2017-18 [#]	147	135	85	132	105
2016-17*	145	136	84	129	105
2016-17 [#]	145	141	77	136	112
2015-16 [#]	142	132	71	123	107
2015-16*	142	138	72	131	110
2014-15*	141	137	96	128	116
2013-14*	140	133	60	125	106

* Survey item was “medical socioeconomics”

Survey question was “medical economics”

2015-16, 2016-17, and 2017-18 surveys included both terms

For 2016-17 and 2017-18, schools were also asked where in the curriculum the specific topics were covered to prepare students for entry into residency training.

Health system content (e.g., health care financing, billing, coding)					
Survey year	Total number of schools surveyed	Location in curriculum			
		4 th year transition to residency course	Required sub-internship	Required 3 rd year clinical clerkship	Intersession
2017-18	147	67	42	80	42
2016-17	145	82	51	93	52

The accreditation standards of the Commission on Accreditation of Osteopathic Colleges (COCA) do not explicitly state a requirement for curriculum related to medical economics or health care financing.¹⁰

The Accreditation Council for Graduate Medical Education common program requirements IV.B.1.f).(1).(f) and (g) require residents to demonstrate competence in “incorporating considerations of value, cost awareness, delivery and payment...” and “understanding health care finances and its impact on individual patients’ health decisions.”¹¹ A limited review of specialty-specific milestones, the mechanism by which residents are assessed for achievement of

competency, revealed that family medicine, internal medicine, emergency medicine, and diagnostic radiology have milestones that assess residents' competency in delivering cost-conscious care, cost-effective care, or consideration of health care costs.¹²

CURRENT INITIATIVES

Despite the UME and GME requirements noted above, there has been a growing realization of the need for additional training in health systems, including health care financing and medical economics during UME. To address this concern, the concept of health systems science (HSS) has recently taken hold as a "third pillar" of medical education¹³ (basic science and clinical science being the traditional two pillars). In recognition of the need to change the medical education system to train physicians in HSS, the AMA funded the Accelerating Change in Medical Education initiative, with the goal of enhancing medical school curricula to better train future physicians in the competencies needed to provide high quality care in health systems. HSS curriculum, which includes medical economics content, is a focus of the initiative. A tangible outcome from the consortium was the publication of the first HSS textbook.¹⁴ The initial 11-school consortium has grown to 37 schools. The AMA also supports a learning module, "Health Care Delivery Systems - AMA Health Systems Science Learning Series," through the AMA Ed Hub.¹⁵ In addition, through its GME Competency Education Program (GCEP), the AMA offers a series of online educational modules designed to complement teachings in residency and fellowship programs, with a library of more than 30 individualized courses designed for self-paced learning. One content area of the module is how payment models affect patient care and costs. A study of consortium schools found that health care economics and value-based care are core domains of their HSS curricula.¹⁶

The inclusion of UME curricular content on HSS in general, and health care financing specifically, has been advanced by the inclusion of these topics on standardized examinations. The United States Medical Licensing Examination (USMLE) Content Outline website lists health care economics, health care financing, high value/cost-conscious care, and relevant subtopics as content areas across all USMLE examinations.¹⁷ A case-based review book on HSS has been developed by the ACE consortium as a review tool on HSS topics covered on the USMLE examinations.¹⁸ The review book includes a chapter of cases and questions on health care economics.¹⁹ To further support HSS assessment at the UME level, a pilot subject examination in HSS has been developed by a consortium of medical schools in collaboration with the National Board of Medical Examiners.²⁰

RELEVANT AMA POLICY

H-295.924, "Future Directions for Socioeconomic Education" (Modified and reaffirmed 2017)

The AMA: (1) asks medical schools and residencies to encourage that basic content related to the structure and financing of the current health care system, including the organization of health care delivery, modes of practice, practice settings, cost effective use of diagnostic and treatment services, practice management, risk management, and utilization review/quality assurance, is included in the curriculum; (2) asks medical schools to ensure that content related to the environment and economics of medical practice in fee-for-service, managed care and other financing systems is presented in didactic sessions and reinforced during clinical experiences, in both inpatient and ambulatory care settings, at educationally appropriate times during undergraduate and graduate medical education; and (3) will encourage representatives to the Liaison Committee on Medical Education (LCME) to ensure that survey teams pay close attention during the accreditation process to the degree to which "socioeconomic" subjects are covered in the medical curriculum.

D-295.321, "Health Care Economics Education" (Modified and reaffirmed 2015)

Our AMA, along with the Association of American Medical Colleges, Accreditation Council for Graduate Medical Education, and other entities, will work to encourage education in health care economics during the continuum of a physician's professional life, starting in undergraduate medical education, graduate medical education and continuing medical education.

H-295.977, "Socioeconomic Education for Medical Students" (Modified 2010)

1. The AMA favors (a) continued monitoring of U.S. medical school curricula and (b) providing encouragement and assistance to medical school administrators to include or maintain material on health care economics in medical school curricula.
2. Our AMA will advocate that the medical school curriculum include an optional course on coding and billing structure, RBRVS, RUC, CPT and ICD-9.

H-295.864, “Systems-Based Practice Education for Medical Students and Resident/Fellow Physicians” (Modified and reaffirmed 2017)

Our AMA: (1) supports the availability of educational resources and elective rotations for medical students and resident/fellow physicians on all aspects of systems-based practice, to improve awareness of and responsiveness to the larger context and system of health care and to aid in developing our next generation of physician leaders; (2) encourages development of model guidelines and curricular goals for elective courses and rotations and fellowships in systems-based practice, to be used by state and specialty societies, and explore developing an educational module on this topic as part of its Introduction to the Practice of Medicine (IPM) product; and (3) will request that undergraduate and graduate medical education accrediting bodies consider incorporation into their requirements for systems-based practice education such topics as health care policy and patient care advocacy; insurance, especially pertaining to policy coverage, claim processes, reimbursement, basic private insurance packages, Medicare, and Medicaid; the physician's role in obtaining affordable care for patients; cost awareness and risk benefit analysis in patient care; inter-professional teamwork in a physician-led team to enhance patient safety and improve patient care quality; and identification of system errors and implementation of potential systems solutions for enhanced patient safety and improved patient outcomes.

SUMMARY AND RECOMMENDATIONS

The academic literature suggests that education and role-modeling have an effect on the cost-effectiveness of care provided by graduates of programs that emphasize cost considerations in education of physicians. Curriculum content on health care financing/medical economics is required by the accrediting bodies for allopathic medical schools and GME programs. With few exceptions, allopathic medical schools report the inclusion of the topics of health care financing, health care costs, medical socioeconomics, and medical economics in their respective curricula. Several of the larger GME specialty milestones require cost considerations in the training curricula. The exact content and amount of curricular time devoted to these topics at individual schools and GME programs is unknown. The AMA provides online educational resources on HSS topics, including the effect of payment models on health outcomes and cost of care, and the AMA-supported Accelerating Change in Medical Education initiative includes medical economics in the focus area of HSS. USMLE Step exams include questions on health care economics, and a subject exam focusing on HSS has been developed. The AMA has existing policy encouraging medical schools and residency programs to include health care finance and medical economics in their respective curricula while avoiding curricular mandates.

Related to Resolution 307-A-18, its first directive (that the AMA “study the extent to which medical schools and residency programs are teaching topics of healthcare finance and medical economics”) has been addressed through this report.

The resolution also asks that the AMA “make a formal suggestion to the Liaison Committee on Medical Education encouraging the addition of a new Element, 7.10, under Standard 7, ‘Curricular Content,’ that would specifically address the role of healthcare finance and medical economics in undergraduate medical education.” To address this aspect, amendments to Policy H-295.924, “Future Directions for Socioeconomic Education,” are proposed below. The rationale for each edit is as follows:

- GME programs, not medical schools, are responsible for graduate medical education. Most GME programs are not under the direct authority of medical schools. Adding “and residencies” to item 2 of this policy clarifies the responsibility and authority for oversight of graduate medical education and curricular content.
- Historically, the AMA has refrained from curricular mandates, especially mandates with this degree of specificity. Similarly, the LCME has been disinclined to accept recommendations with curricular mandates. Eliminating the phrase “in didactic sessions and reinforced during clinical experiences, in both inpatient and ambulatory care settings” allows for more flexibility to medical schools and residency programs in implementation of this curricular content.
- The AMA does not have “representatives” on the LCME. Some LCME members are nominated by the AMA for consideration as professional members of the LCME, but, if elected by the LCME, they do not represent the AMA. Their fiduciary responsibility while serving as a member of the LCME is to the LCME. DOE regulations require separation of the accrediting agency from direct sponsor influence.

The Council on Medical Education therefore recommends that the following recommendation be adopted in lieu of Resolution 307-A-18 and the remainder of the report be filed.

1. That our American Medical Association (AMA) amend Policy H-295.924, “Future Directions for Socioeconomic Education,” by addition and deletion to read as follows:

The AMA: (1) asks medical schools and residencies to encourage that basic content related to the structure and financing of the current health care system, including the organization of health care delivery, modes of practice, practice settings, cost effective use of diagnostic and treatment services, practice management, risk management, and utilization review/quality assurance, is included in the curriculum; (2) asks medical schools and residencies to ensure that content related to the environment and economics of medical practice in fee-for-service, managed care and other financing systems is presented ~~in didactic sessions and reinforced during clinical experiences, in both inpatient and ambulatory care settings~~, at educationally appropriate times during undergraduate and graduate medical education; and (3) will encourage representatives to the Liaison Committee on Medical Education (LCME) to ensure that survey teams pay close attention during the accreditation process to the degree to which ‘socioeconomic’ subjects are covered in the medical curriculum.

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**3. STANDARDIZATION OF MEDICAL LICENSING TIME LIMITS ACROSS STATES
(RESOLUTION 305-A-18)**

Reference committee hearing: see report of Reference Committee C.

**HOUSE ACTION: RECOMMENDATIONS ADOPTED AS FOLLOWS
IN LIEU OF RESOLUTION 305-A-18
REMAINDER OF REPORT FILED**
See Policy H-275.978

INTRODUCTION

Resolution 305-A-18, introduced by the American Medical Association Medical Student Section (AMA-MSS), asked that our AMA:

Amend Policy H-275.978, “Medical Licensure,” by addition to read as follows

The AMA... (23) urges the state medical and osteopathic licensing boards which maintain a time limit on complete licensing examination sequences to adopt a time limit of no less than 10 years for completion of a licensing examination sequence for either USMLE or COMLEX.

Testimony before Reference Committee C at the 2018 Annual Meeting was in favor of referring this complex item for further study. Some states have no time limit for completion of the licensing examination sequence; some set a time limit of seven years; and some cap eligibility at 10 years (to accommodate the longer timeline for dual-degree individuals, e.g., those seeking to hold MD and PhD credentials). Testimony was heard concerning the perception that physicians who have academic troubles will take longer to complete the sequence, such that the time limit becomes a mechanism through which to ensure patient safety by eliminating these individuals from the practice of medicine. This belief, however, does not take into account the legitimate health or personal issues that may affect a given physician’s ability to complete all exams within a prescribed timeframe, or the challenges faced by those pursuing dual degrees. Testimony in favor of a time limit was that this would ensure that examinees are being assessed based on their current medical knowledge. Accordingly, the AMA House of Delegates referred this item, to ensure a comprehensive, holistic review and study of all the relevant factors and consideration of potential unintended consequences, with the involvement of all relevant stakeholders, such as the Federation of State Medical Boards (FSMB) and the 70 state medical and osteopathic regulatory boards it represents.

BACKGROUND

State medical boards are entrusted to protect the public from unprofessional, unlawful or incompetent physician behavior. To ensure that physicians practicing in a state or jurisdiction are minimally competent to provide patient care, physicians under the board’s purview are required to complete either the United States Medical Licensing Examination (USMLE), for allopathic medical school graduates, or the Comprehensive Osteopathic Medical Licensing Examination (COMLEX-USA), if a graduate of an osteopathic medical college. Passage of the USMLE or the COMLEX-USA is necessary to be eligible for a full and unrestricted license to practice medicine. Both the USMLE and COMLEX-USA are composed of a series of exams. Most students studying medicine in the U.S. take the first three exams while in medical school; the final exam is typically taken while the physician is in residency training.

Current U.S. Licensing Completion Requirements

States may have different requirements as to the number of attempts to pass the exams, as well as different limits that cap the length of time for completion. Furthermore, many states allow for more time if the physician is pursuing a dual-degree (e.g., MD-PhD), and may also waive the time limit in the event of extenuating circumstances. Although many states have similar requirements, there is no universal standard, and there is great variability between MD and DO boards within states (for USMLE and COMLEX-USA, respectively) and between states. Table 1 presents data from the FSMB on the 66 licensing boards in the states, District of Columbia, and Puerto Rico. Some states’ responses regarding extenuating circumstances are omitted due to lack of clarity.¹

Table 1. U.S. medical boards' USMLE or COMLEX-USA completion time limits

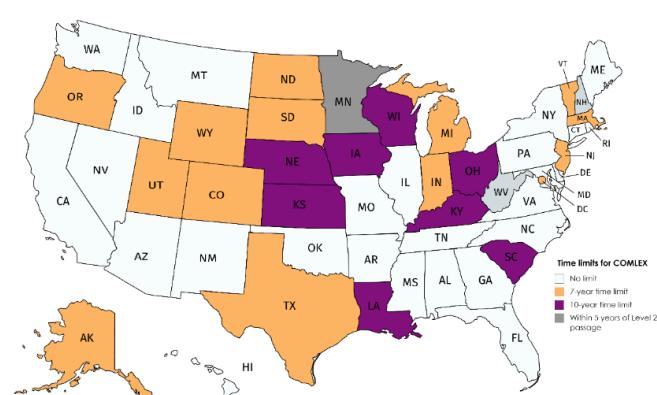
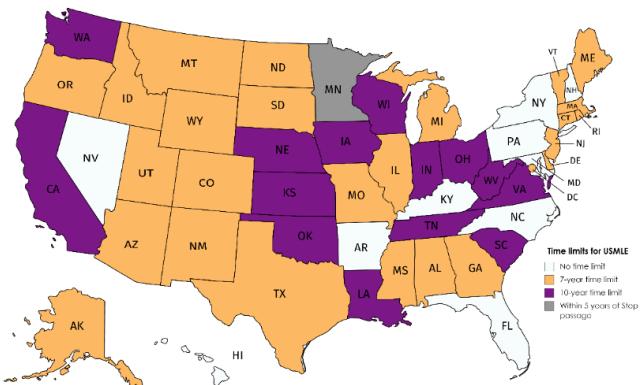
	<u>No limit</u>	<u>7 years</u>	<u>8 years</u>	<u>9 years</u>	<u>10 years</u>	<u>12 years</u>
USMLE	10	28			13	
COMLEX-USA	22	14			8	
MD/DO-PhD/dual degree	4		1	1	14	1

Although 23 of reporting boards with a time limit for completion will waive the limit depending on extenuating circumstances, 12 will not; these 12 have the time limits as shown in Table 2.

Table 2. USMLE or COMLEX-USA completion and dual-degree time limits of U.S. medical boards that do not waive time limits

<u>Number of boards</u>	<u>USMLE/COMLEX-USA limit</u>	<u>Dual-degree limit</u>
6	7 years	—
2	10 years	—
1	7 years	8 years
1	7 years	10 years
1	10 years	10 years
1	10 years	12 years

The two maps present time limits for USMLE and COMLEX-USA completion. Although some contiguous states have identical requirements, many do not. For example, four of the five states bordering New York—which has no time limit for completion of USMLE—require completion within seven years.



Data from the National Board of Medical Examiners (NBME), the organization that administers the USMLE, suggests that most physicians pass the three steps of the USMLE within seven years of starting the process (91 percent); 99 percent complete the USMLE within 10 years. These data are for U.S. medical school graduates of schools accredited by the Liaison Committee on Medical Education (LCME) and do not include graduates of foreign medical schools or graduates of osteopathic medical schools.² Similarly, the National Board of Osteopathic Medical Examiners (NBOME), which administers the COMLEX-USA, has found the average time from the initial attempt of the Level 1 examination to completion of COMLEX-USA with passage of Level 3 to be 2.81 years. In addition, less than 0.2% of candidates who passed Level 3 between 2015 and 2019 took longer than seven years.³

In a study examining the performance of over 40,000 Step 3 examinees, Feinberg et al. reported that 55 percent of examinees took the Step 3 exam within six to 18 months of starting residency, 93 percent tested within 36 months of training, and 99 percent had tested within 60 months of starting training.⁴

Patient Safety and Workforce Issues

The purpose of passing the USMLE and the COMLEX-USA is to ensure the public that a physician has met a standard of medical knowledge and clinical skills to provide safe and effective patient care. There have been studies examining the association between USMLE performance and 1) demographic characteristics of physicians⁵ and 2) academic performance, remediation, and referral to a competency committee while in medical school,^{6,7} among other studies. Much is unknown, however, about USMLE/COMLEX-USA performance and state medical licensure. In a study that found an association between physicians' unprofessional behavior noted during medical school and subsequent disciplinary actions by state medical licensing boards, there was no statistical association with Step 1 score and subsequent disciplinary action.⁸ A study by Cuddy et al. that included Step 1, Step 2 CK scores, and state medical licensure data on over 164,000 physicians found that higher Step 2 CK scores were associated with a decreased chance of disciplinary action.⁹

Actions taken by state medical licensure boards are, by default, taken against physicians who have completed the medical licensure process. As Cuddy et al. point out: "Physicians who fail the USMLE are unable to obtain a license to practice medicine in the United States, thus precluding the possibility of establishing whether or not physicians who have met USMLE standards provide better patient care than those who have failed to meet these standards."⁹ It is not known if physicians who do not become licensed as a result of not completing the licensure process within the time required, or ever, would pose a risk to patient safety—linkages have been made between poor performance on exams and academic performance in medical school and state disciplinary actions. It can be assumed that *failing* the exams is an indicator of compromised physician competency.

Physician-scientists, or physicians who pursue PhDs as well as clinical training, are an important workforce in biomedical research; however, they likely take longer to become licensed, an accommodation recognized by 21 state licensing boards. Typically, around 550 physicians graduate each year with an MD-PhD, taking approximately eight years to receive both degrees.¹⁰

When considering time-limit exceptions for completing the USMLE sequence in the case of dual-degree physicians, the NBME recommends state licensing boards waive the time limit for candidates meeting the following requirements:

- The candidate has obtained both degrees from an institution or program accredited by the LCME and a regional university accrediting body.
- The PhD should reflect an area of study which ensures the candidate a continuous involvement with medicine and/or issues related, or applicable to, medicine.
- A candidate seeking an exception to the seven-year rule should be required to present a verifiable and rational explanation for the fact that he or she was unable to meet the seven-year limit. These explanations will vary, and each licensing jurisdiction will need to decide on its own which explanation justifies an exception. Students who pursue both degrees should understand that while many states' regulations provide specific exceptions to the seven-year rule for dual-degree candidates, others do not. Students pursuing a dual degree are advised to check the state-specific requirements for licensure listed by the FSMB.¹¹

The NBME has had discussions with its Advisory Committee for Medical School Programs concerning dual-degree candidates and their potential need for more time to complete the licensure sequence than some states may permit.

Within those discussions, however, the committee was not able to identify a qualified dual-degree candidate who was denied state licensure based on exceeding a state time-limited rule for passing USMLE.²

What is not known is how many physicians are delayed in completing the USMLE or COMLEX-USA sequence due to life circumstances, including taking a leave of absence to care for a family member or for other personal situations. Physicians who do not become licensed can pursue careers in health-related fields but will not be able to practice medicine. At a time when physician workforce shortages are predicted, lack of state licensure resulting solely from circumstances that did not permit a physician to complete the USMLE or COMLEX-USA sequence within a given time limit seems improvident.

Advantages to Nationwide Uniformity

Medical licensing boards vary greatly in their regulations concerning the number of times physicians can take the different Step or Level exams, the length of time to complete the sequence for single- or dual-degree physicians, and whether exceptions can be made for qualifying extenuating circumstances. States that are contiguous can have very different requirements. Yet, once a physician is licensed in one jurisdiction, and is in good standing, another licensing board is not likely to weigh the length of time the physician required to complete the exam sequence in the initial location against the physician if he or she is seeking a license to practice in a new state. Without data suggesting qualitative differences in the competency of physicians who become licensed in seven versus 10 years, or even longer, there may be few valid arguments for time limits except as an external source for motivation to complete the task—although the ability to independently practice medicine should be the most compelling motivation.

RELEVANT AMA POLICY

The appendix shows relevant AMA policy, including H-275.955, “Physician Licensure Legislation” and D-275.994, “Facilitating Credentialing for State Licensure.”

SUMMARY AND RECOMMENDATIONS

There is geographic mobility among physicians, particularly soon after completing residency or in pursuing a fellowship, and crossing state lines is likely. Ensuring uniformity in the time requirement in which to become fully licensed would remove one regulatory burden for young physicians when mapping out their career and future practice location. Furthermore, an acknowledgement of, and accommodation for, the many life events that can affect the ability to study for and take the required exams may potentially allow for greater diversity among the physician workforce. Lastly, providing the extra time that dual-degree physicians need in order to complete both degrees and become fully licensed will ensure that this vital workforce is fully integrated into both research and clinical realms.

The Council on Medical Education therefore recommends that the following recommendations be adopted in lieu of Resolution 305-A-18 and the remainder of this report be filed:

1. That our American Medical Association (AMA) urge the state medical and osteopathic boards that maintain a time limit for completing licensing examination sequences for either USMLE or COMLEX to adopt a time limit of no less than 10 years.
2. That our AMA urge that state medical and osteopathic licensing boards with time limits for completing the licensing examination sequence provide for exceptions that may involve personal health/family circumstances.

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APPENDIX: Relevant AMA Policy

H-275.955, “Physician Licensure Legislation”

Our AMA reaffirms earlier policy urging licensing jurisdictions to adopt laws and rules facilitating the movement of physicians between states, to move toward uniformity in requirements for the endorsement of licenses to practice medicine, and to base endorsement of medical licenses on an assessment of competence rather than on passing a written examination of cognitive knowledge.

D-275.994, “Facilitating Credentialing for State Licensure”

Our AMA: (1) encourages the Federation of State Medical Boards to urge its Portability Committee to complete its work on developing mechanisms for greater reciprocity between state licensing jurisdictions as soon as possible; (2) will work with the Federation of State Medical Boards (FSMB) and the Association of State Medical Board Executive Directors to encourage the increased standardization of credentials requirements for licensure, and to increase the number of reciprocal relationships among all licensing jurisdictions; (3) encourages the Federation of State Medical Boards and its licensing jurisdictions to widely disseminate information about the Federation's Credentials Verification Service, especially when physicians apply for a new medical license; and (4) supports the FSMB Interstate Compact for Medical Licensure and will work with interested medical associations, the FSMB and other interested stakeholders to ensure expeditious adoption by the states of the Interstate Compact for Medical Licensure and creation of the Interstate Medical Licensure Compact Commission.

4. BOARD CERTIFICATION CHANGES IMPACT ACCESS TO ADDICTION MEDICINE SPECIALISTS (RESOLUTION 314-A-18)

Reference committee hearing: see report of Reference Committee C.

HOUSE ACTION: RECOMMENDATIONS ADOPTED AS FOLLOWS

IN LIEU OF RESOLUTION 314-A-18

REMAINDER OF REPORT FILED

See Policy H-300.962

Resolution 314-A-18, “Board Certification Changes Impact Access to Addiction Medicine Specialists,” introduced by the Michigan Delegation and referred by the American Medical Association (AMA) House of Delegates (HOD), asks:

That our American Medical Association work with the American Board of Addiction Medicine (ABAM) and American Board of Medical Specialties (ABMS) to accept ABAM board certification as equivalent to any other ABMS-recognized Member Board specialty as a requirement to enroll in the transitional maintenance of certification program and to qualify for the ABMS Addiction Medicine board certification examination.

This resolution was referred due to mixed testimony about the new requirements for ABMS subspecialty board certification in addiction medicine and concerns centered around the equivalency of ABAM and ABMS board certifications. Although a number of physicians have held ABAM certification, they do not meet the requirements for ABMS subspecialty certification in addiction medicine if they do not hold current ABMS certification in a primary specialty. Although specialty board certification is not required to practice medicine, it may be needed to meet the credentialing requirements of hospitals.

This report calls attention to the urgent need to train physicians in addiction medicine, provides background information on the process for obtaining subspecialty board certification in addiction medicine, and provides an update on the time-limited pathway for subspecialty certification in addiction medicine for ABAM diplomates.

BACKGROUND

More than 20 million Americans need treatment for substance use disorder, and 2 million Americans have an opioid use disorder.¹⁻² However, only 3,500 U.S. physicians (approximately) are trained in addiction medicine to meet this need.² Although medical schools and teaching hospitals are actively working to address the crisis in their communities, more physicians need to be trained in addiction medicine to address this public health challenge.

Since 2008, the ABAM, a non-ABMS member board, has offered certification and recertification in addiction medicine. ABAM certification is valid as long as ABAM diplomates maintain enrollment in the ABAM Maintenance of Certification program.³ In October 2015, the new subspecialty of addiction medicine, sponsored by the American Board of Preventive Medicine (ABPM), was recognized by the ABMS.⁴ In June 2016, fellowship training in addiction medicine was approved by the Accreditation Council for Graduate Medical Education (ACGME).

In 2017, the ABPM began offering physicians the opportunity to become certified in the subspecialty of addiction medicine, and physicians certified by any of the ABMS member boards have been eligible to apply. During the first five years (2017-2021) the addiction medicine examination is given, individuals may become qualified by the Practice Pathway (through which physicians can meet eligibility requirements for certification in addiction medicine without completing an addiction medicine fellowship). In order to meet the requirements for ABPM subspecialty certification in addiction medicine, physicians who do not hold ABAM certification must also hold a current ABMS certification in any primary specialty to meet the requirements for ABPM subspecialty certification in addiction medicine.

ABPM PATHWAYS AVAILABLE TO ACHIEVE SUBSPECIALTY CERTIFICATION IN ADDICTION MEDICINE

There are multiple pathways to achieve subspecialty certification in addiction medicine through the ABPM, as described below.⁵

Practice Pathway

- Time in Practice

Applicants must submit documentation of a minimum of 1,920 hours in which they were engaged in the practice of addiction medicine at the subspecialty level; this minimum of 1,920 hours must have occurred over at least 24 of the previous 60 months prior to application. The minimum of 24 months of practice time need not be continuous; however, all practice time must have occurred in the five-year period preceding June 30 of the application year. Practice must consist of broad-based professional activity with significant addiction medicine responsibility. Applicants must also demonstrate a minimum of 25 percent (or 480 hours) as direct patient care. Addiction medicine practice outside of direct patient care, such as research, administration, and teaching activities, may count for a combined maximum of 75 percent (or 1,440 hours). Only 25 percent (480 hours) of general practice can count towards the required hours for the Practice Pathway, and the remaining 75 percent must be specific addiction medicine practice. Fellowship activity that is less than 12 months in duration or non-ACGME accredited may be applied toward the practice activity requirement. The actual training must be described for any fellowship activity.

Documentation of addiction medicine teaching, research, and administration activities, as well as clinical care or prevention of, or treatment of, individuals who are at risk for or have a substance use disorder may be considered.

- Non-accredited fellowship training

Credit for completion of training in a non-ACGME-accredited fellowship program may be substituted for the Time in Practice hour requirements of the Practice Pathway. To qualify, the applicant must have successfully completed a non-ACGME-accredited addiction medicine fellowship of at least 12 months that is acceptable to the ABPM. The fellowship training curriculum as well as a description of the actual training experience must also be submitted to the ABPM for its review and consideration.

Fellowship training of less than 12 months in a non-ACGME accredited program may be applied towards the Time in Practice hour requirements of the Practice Pathway.

ABAM Diplomate Pathway (available through 2021)

Applicants holding certification by ABAM must meet the medical licensure and ABPM certification requirements to be considered for the addiction medicine subspecialty examination. Documentation of current ABAM diplomate status may be submitted in place of practice time documentation and required attestation of clinical competence. (ABAM diplomates are required to maintain certification through ABAM's Transitional Continuous Certification [TraCC] Program. Diplomates who passed ABAM's certifying exam in 2015 or who recertified by passing ABAM's recertifying exam in 2015 may be qualified to expedite the certification process with the ABPM.)

ABAM diplomates certified, or recertified, in 2015 must submit formal application through the ABAM diplomate pathway and be accepted by the ABPM. Only then may their ABPM certifying exam be waived and certification conferred following usual procedures, with an effective date of January 1 of the year following the ABPM's approval of the formal application.

The Addiction Medicine ABAM Diplomate Pathway will expire in 2021. Beginning in 2022, all applicants for ABPM certification in addiction medicine must successfully complete an ACGME-accredited addiction medicine fellowship program.

ACGME-accredited Fellowship Pathway

Applicants must successfully complete a minimum of 12 months in an ACGME-accredited addiction medicine fellowship program. If the program is longer than 12 months, the physician must successfully complete all years of training for which the program is accredited in order to meet the eligibility criteria for certification in addiction medicine.

**THE ABMS COMMITTEE ON CERTIFICATION (COCERT) APPROVED SPECIFIC, TIME-LIMITED
PATHWAY FOR SUBSPECIALTY CERTIFICATION IN ADDICTION MEDICINE
FOR ABAM DIPLOMATES**

In 2018, the ABPM, in collaboration with the American Society of Addiction Medicine, submitted a request to ABMS to expand the eligibility requirements for the ABPM's Addiction Medicine subspecialty.⁶ The ABPM's request was limited in time to include a period beginning on January 1, 2019 and ending at the conclusion of the 2021 exam cycle on December 31, 2021. In March 2019, the ABMS Committee on Certification (COCERT) approved the ABPM's request to expand eligibility to include physicians certified by ABAM, current with the ABAM's TraCC Program, and who previously possessed underlying primary certification from an ABMS member board but allowed that certification to lapse because addiction medicine became the primary area of the physician's practice.

The proposed expansion excluded physicians who never obtained primary ABMS member board certification, who lost ABMS member board certification as a result of a disciplinary action, or who may have surrendered a medical license in lieu of or otherwise to avoid the possibility of disciplinary action.

**DIPLOMATES CERTIFIED BY THE ABPM IN ADDICTION MEDICINE NO LONGER REQUIRED TO
MAINTAIN PRIMARY CERTIFICATION TO RECERTIFY IN ADDICTION MEDICINE**

Previously, the ABMS approved ABPM's request that diplomates certified by the ABPM in addiction medicine will no longer be required to maintain primary ABMS member board certification in order to recertify. With this policy change, diplomates certified by the ABPM in addiction medicine may recertify their ABPM subspecialty certificate in addiction medicine without the need to maintain primary ABMS member board certification.

RELEVANT AMA POLICY

It is the policy of the AMA to encourage all physicians, particularly those in primary care fields, to undertake education in treatment of substance use disorder. The AMA also supports the new ABMS-approved multispecialty subspecialty of addiction medicine, which offers certification to qualified physicians who are diplomates of any of the 24 ABMS

member boards and the ABPM certification examination in addiction medicine. AMA policies related to addiction medicine and specialty board certification are shown in the Appendix.

DISCUSSION

There is a significant shortage of qualified addiction physicians in the United States, and physicians from a variety of disciplines (e.g., internal medicine, family medicine, pediatrics) are needed.⁷ Expanding the ABPM pathway will assist in growing the addiction medicine workforce at a time when the treatment of opioid addiction is a national public health crisis and there is a spectrum of medical problems associated with substance use disorders.⁷

The ABPM pathway runs through an examination and not through any “deeming” or general recognition of equivalency of any board outside the ABMS member board community. Thus, individuals will be required to demonstrate to the ABPM that they possess the “knowledge, clinical skills, and professionalism” to practice safely in the discipline of addiction medicine in order to be granted a certificate from this ABMS member board. Physicians who choose to become certified in the new subspecialty may qualify to take the addiction medicine exam by meeting time-in-practice and other eligibility requirements, but will not be required to complete specialized fellowship training at this time. However, in 2022 the ABPM will require physicians to complete an ACGME-accredited program. The ACGME has accredited 62 twelve-month addiction medicine fellowship programs, with plans to increase the number of programs to 125.⁸ Education in addiction medicine is also becoming a viable choice for medical students and residents.⁹

The American Osteopathic Association (AOA) has also created a mechanism to allow osteopathic physicians (DOs) with an active primary AOA board certification and ABAM certification to be granted AOA subspecialty certification in addiction medicine.¹⁰ Osteopathic physicians will be required to maintain such certification through the AOA’s addiction medicine osteopathic continuous certification process.¹⁰

SUMMARY AND RECOMMENDATIONS

The Council on Medical Education has been committed to working with the ABMS and the ABPM to ensure that all qualified physicians are offered pathways to obtain ABMS-approved certification in the new ABPM subspecialty of addiction medicine in order to improve access to care for patients with substance use disorder.

The Council on Medical Education therefore recommends that the following recommendations be adopted in lieu of Resolution 314-A-18 and the remainder of the report be filed.

1. That our American Medical Association (AMA) recognize the American Board of Preventive Medicine (ABPM) for developing and providing pathways for all qualified physicians to obtain ABMS-approved certification in the new ABPM subspecialty of addiction medicine, in order to improve access to care for patients with substance use disorder.
2. That our AMA rescind Policy H-300.962 (3) “Recognition of Those Who Practice Addiction Medicine,” since the ABPM certification examination in addiction medicine is now offered.
3. That our AMA recognize the American Osteopathic Association Bureau of Osteopathic Specialists for developing and providing a pathway for all qualified physicians to obtain subspecialty certification in addiction medicine, in order to improve access to care for patients with substance use disorder.
4. That our AMA recognize the American Osteopathic Association (AOA) for developing and providing a pathway for qualified physicians (DOs and MDs) with an active primary AOA board certification in any specialty to obtain subspecialty certification in Addiction Medicine, in order to improve access to care for patients with substance use disorder.

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APPENDIX

H-300.962, "Recognition of Those Who Practice Addiction Medicine"

1. It is the policy of the AMA to: (a) encourage all physicians, particularly those in primary care fields, to undertake education in treatment of substance abuse; (b) direct its representatives to appropriate Residency Review Committees (RRCs) to ask the committees on which they serve to consider requiring instruction in the recognition and management of substance abuse. Those RRCs that already require such instruction should consider greater emphasis for this subject. (c) encourage treatment of substance abuse as a subject for continuing medical education; and (d) affirm that many physicians in fields other than psychiatry have graduate education and experience appropriate for the treatment of substance abuse, and for utilization review, and for other evaluation of such treatment, and should be entitled to compensation.
2. Our AMA commends the American Board of Preventive Medicine (ABPM) for its successful application to the American Board of Medical Specialties (ABMS) to establish the new ABMS-approved multispecialty subspecialty of addiction medicine, which will be able to offer certification to qualified physicians who are diplomates of any of the 24 ABMS member boards.
3. Our AMA encourages the ABPM to offer the first ABMS-approved certification examination in addiction medicine expeditiously in order to improve access to care to treat addiction.

(CME Rep. I-93-5 Reaffirmed: CME Rep. 10, I-98 Reaffirmed: CME Rep. 11, A-07 Appended: Res. 314, A-16)

Policy H-275.924 (15), "Continuing Board Certification"

15. The MOC program should not be a mandated requirement for licensure, credentialing, recredentialing, privileging, reimbursement, network participation, employment, or insurance panel participation.

H-275.926, "Medical Specialty Board Certification Standards"

Our AMA:

1. Opposes any action, regardless of intent, that appears likely to confuse the public about the unique credentials of American Board of Medical Specialties (ABMS) or American Osteopathic Association Bureau of Osteopathic Specialists (AOA-BOS) board certified physicians in any medical specialty, or take advantage of the prestige of any medical specialty for purposes contrary to the public good and safety.
2. Continues to work with other medical organizations to educate the profession and the public about the ABMS and AOA-BOS board certification process. It is AMA policy that when the equivalency of board certification must be determined, accepted standards, such as those adopted by state medical boards or the Essentials for Approval of Examining Boards in Medical Specialties, be utilized for that determination.
3. Opposes discrimination against physicians based solely on lack of ABMS or equivalent AOA-BOS board certification, or where board certification is one of the criteria considered for purposes of measuring quality of care, determining eligibility to contract with managed care entities, eligibility to receive hospital staff or other clinical privileges, ascertaining competence to practice medicine, or for other purposes. Our AMA also opposes discrimination that may occur against physicians involved in the board certification process, including those who are in a clinical practice period for the specified minimum period of time that must be completed prior to taking the board certifying examination.
4. Advocates for nomenclature to better distinguish those physicians who are in the board certification pathway from those who are not.

5. Encourages member boards of the ABMS to adopt measures aimed at mitigating the financial burden on residents related to specialty board fees and fee procedures, including shorter preregistration periods, lower fees and easier payment terms. (Res. 318, A-07 Reaffirmation A-11 Modified: CME Rep. 2, I-15)

D-120.985, "Education and Awareness of Opioid Pain Management Treatments, Including Responsible Use of Methadone"

1. Our AMA will incorporate into its web site a directory consolidating available information on the safe and effective use of opioid analgesics in clinical practice.
2. Our AMA, in collaboration with Federation partners, will collate and disseminate available educational and training resources on the use of methadone for pain management.
3. Our AMA will work in conjunction with the Association of American Medical Colleges, American Osteopathic Association, Commission on Osteopathic College Accreditation, Accreditation Council for Graduate Medical Education, and other interested professional organizations to develop opioid education resources for medical students, physicians in training, and practicing physicians.

(Sub. Res. 508, A-03 Reaffirmed: CSAPH Rep. 1, A-13 Appended: Res. 515, A-14 Reaffirmed: BOT Rep. 14, A-15 Appended: Res. 311, A-18 Reaffirmation: A-19)

H-310.906, "Improving Residency Training in the Treatment of Opioid Dependence"

Our AMA: (1) encourages the expansion of residency and fellowship training opportunities to provide clinical experience in the treatment of opioid use disorders, under the supervision of an appropriately trained physician; and (2) supports additional funding to overcome the financial barriers that exist for trainees seeking clinical experience in the treatment of opioid use disorders.

5. THE TRANSITION FROM UNDERGRADUATE MEDICAL EDUCATION TO GRADUATE MEDICAL EDUCATION

Informational report; no reference committee hearing.

HOUSE ACTION: FILED

INTRODUCTION

A critical step in the development of a physician is the transition from undergraduate medical education (UME), or medical school, to graduate medical education (GME), or residency training. Ensuring a seamless transition supports learners' well-being and their readiness to take on and master the many challenges in their chosen field of medicine. In addition, patient safety in our nation's teaching hospitals is paramount in the public eye, as evidenced by coverage of the "July Effect" in the media. This underscores the need for preparedness among first-year resident physicians as well as the need for a highly effective, efficient, and supportive educational environment.

The American Medical Association (AMA) has taken a lead role to address these issues and call for medical education to "mind the gap" between the various stages of medical education—in particular, the UME to GME transition—in part through its Accelerating Change in Medical Education initiative and Reimagining Residency initiative, as described in this report. The AMA is working to help smooth the transition from UME to GME as part of its effort to encourage innovation in the development of medical students, trainees, and physicians throughout their career. This report also provides relevant AMA policy on this topic (see the Appendix).

MEDICAL SCHOOL PREPARATION OF GRADUATES FOR RESIDENCY

One body of data that measures medical student preparedness for entry into residency is the Association of American Medical Colleges' (AAMC) Graduation Questionnaire (GQ), a national questionnaire administered to graduates of U.S. MD-granting medical schools accredited by the Liaison Committee on Medical Education (LCME).¹ The GQ is an important tool for medical schools to use in program evaluation and to improve the medical student experience.

The AAMC's [All Schools Summary Report for 2018](#)² includes GQ data for the five-year period 2014 to 2018. Eighty-three percent (16,223) of medical school graduates in academic year 2017-2018 (19,537) participated in the 2018 GQ.

Question 12 of the questionnaire asks respondents, "Indicate whether you agree or disagree with the following statements about your preparedness for beginning a residency program." Averaging the data for the five-year period (2014 to 2018) produces the following numbers. In the right-hand column, the percentages from the "Agree" and "Strongly agree" fields are combined; the table is sorted based on this variable, which ranges from a high of 98.3

percent (“I have the communication skills necessary to interact with patients and health professionals”) to 90.2 percent (“I am confident that I have acquired the clinical skills required to begin a residency program”).

Percentage of Respondents Selecting Each Rating					
Strongly disagree	Disagree	Neutral	Agree	Strongly agree	Total: Agree and Strongly agree
I have the communication skills necessary to interact with patients and health professionals.					
0.2	0.2	1.4	26.2	72.1	98.3
I understand the ethical and professional values that are expected of the profession.					
0.2	0.2	1.5	29.9	68.2	98.1
I believe I am adequately prepared to care for patients from different backgrounds.					
0.3	0.6	3.4	35.9	59.9	95.8
I have basic skills in clinical decision making and the application of evidence-based information to medical practice.					
0.3	0.7	4.7	46.2	48.2	94.4
I have a fundamental understanding of the issues in social sciences of medicine (e.g., ethics, humanism, professionalism, organization and structure of the health care system).					
0.3	1.0	4.9	40.9	52.8	93.7
I have the fundamental understanding of common conditions and their management encountered in the major clinical disciplines.					
0.3	1.0	5.2	52.0	41.5	93.5
I am confident that I have acquired the clinical skills required to begin a residency program.					
0.5	1.9	7.4	47.9	42.3	90.2

Another assessment of medical schools’ efforts in preparing medical students for residency is the LCME’s Annual Medical School Questionnaire Part II.

Particularly relevant to this report are data from the question, “Indicate where in the curriculum the following topics to specifically prepare students for entry to residency training are covered” (question 19 for the 2018-2019 questionnaire). Aggregate data for 151 medical schools are shown, sorted by the sum of the numbers for the five places in the curriculum where the specific topic is taught, as shown in the right-hand column.

Topic	Required 4th Year Transition to Residency Course		Required Sub-internship	Required 3rd Year Clinical Clerkship	Inter-session in 3rd or 4th Year	Total
	Specialty-specific	One course for all students				
Training in clinical procedures	55	57	105	135	51	403
Disease management (general or specialty-specific)	44	53	124	140	30	391
Working in teams	32	76	105	124	53	390
Working with the EHR/health records	22	43	110	135	48	358
Hand-off procedures	35	68	100	93	28	324
Patient safety/reporting medical errors	16	77	70	104	51	318
Advanced communication skills	26	68	84	85	44	307
Stress, wellness, and burnout in residency training	19	81	21	63	58	242

Health system content (e.g., team care, health care financing)	12	72	38	73	47	242
On-call emergencies	39	50	84	73	18	264
Experiencing the life of a resident (e.g., night call/float)	24	35	85	75	6	225
Medical regulatory content (e.g., licensure, discipline, DEA)	8	55	10	23	32	128
ACLS/ATLS training and certification	9	47	9	25	35	125

THE AMA'S ACCELERATING CHANGE IN MEDICAL EDUCATION AND REIMAGINING RESIDENCY INITIATIVES

Phase one of the AMA's Accelerating Change in Medical Education initiative, launched in 2013, was intended to:

[F]oster... a culture of medical education advancement, leading to the development and scaling of innovations at the undergraduate medical education level across the country. After awarding initial grants to 11 U.S. medical schools, the AMA convened these schools to form the Accelerating Change in Medical Education Consortium—an unprecedented collective that facilitated the development and communication of groundbreaking ideas and projects. The AMA awarded grants to an additional 21 schools in 2016. Today, almost one-fifth of all U.S. allopathic and osteopathic medical schools are represented in the 32-member consortium [expanded to 37 schools in 2019], which is delivering revolutionary educational experiences to approximately 19,000 medical students—students who one day will provide care to a potential 33 million patients annually.³

Building upon that impetus, in early 2019 the AMA established the Reimagining Residency initiative—a five-year, \$15 million grant program to address challenges associated with the transition from UME to GME and the maintenance of progressive development through residency and across the continuum of physician training. Grants are intended to promote systemic change in GME and support bold, creative innovations that establish new curricular content and experiences to enhance readiness for practice, support well-being in training, and (of particular relevance to this report) provide a meaningful and safe transition from UME to GME. Learn more at: ama-assn.org/education/improve-gme/ama-reimagining-residency-initiative.

Included in the Accelerating Change in Medical Education and Reimagining Residency initiatives are grantees that are focusing on the UME/GME transition. For example, at Florida International University (FIU) Herbert Wertheim College of Medicine, readiness for residency is monitored by way of competency-based assessments using the Entrustable Professional Activities (EPAs).

As an awardee for both the UME and GME phases of the AMA's grants, New York University Langone School of Medicine is using its latest grant to further its coaching experience through the "NYU Transition to Residency Advantage." The goal of this work is to "enhance the transition from UME to GME through robust coaching, individualized pathways, and enhanced assessment tools to enable GME programs to shift away from one-size-fits-all education."⁴ Similarly, the University of North Carolina School of Medicine received funding from the Reimagining Residency initiative for Fully Integrated Readiness for Service Training (FIRST): Enhancing the Continuum from Medical School to Residency to Practice. Its goals include "implementing a generalizable health systems science curriculum for GME and competency-based assessment tools that span the educational continuum."⁵ In addition, the Association of Professors of Gynecology and Obstetrics received a planning grant for its "Right Resident, Right Program, Ready Day One" project, intended to transform the UME to GME transition for residents entering obstetrics and gynecology programs.

CHALLENGES TO CHANGE

As noted in the introduction, certain innovations that improve the transition from UME to GME may challenge existing processes/systems managed by organizations responsible for medical education accreditation, certification, licensing, and residency matching. For example, one of the innovations being studied in the AMA-led consortium is competency-based medical education, in which learners are advanced to the next level of training upon satisfactory demonstration of the requisite knowledge and skills, versus a strictly time-based system that treats all learners alike. Despite the considerable value of this new paradigm from the learner perspective, it may present hurdles to the system of medical

education accreditation, funding, and certification and further inhibit (at least in the short run) the development of a smoother UME/GME transition.

Another concern, which relates to the match into residency, is the growing number of residency program applications being submitted by applicants. This is due, in part, to a growing number of medical school graduates in the U.S. and concerns among residency applicants about limited availability of residency program slots. This issue is particularly pointed in competitive specialties. The increased number of applications is expensive and inefficient for applicants and burdensome for residency program directors and personnel, who must review and prioritize these applications. The rising volume of applications leads programs to employ applicants' scores on the United States Medical Licensing Examination (USMLE) for screening purposes, eliminating applications below a certain arbitrary line.

This process for applicant screening, while understandable given the circumstances, runs counter to AMA policy, which reflects the principle that "selection of residents should be based on a broad variety of evaluative criteria," and asks that ACGME requirements "state clearly that residency program directors must not use NBME or USMLE ranked passing scores as a screening criterion for residency selection."⁶ It also lessens the opportunity for holistic review of candidates, through which more intangible attributes and life experience are given equal (if not greater) weight than school grades and examination scores. Indeed, as noted by the authors of a recent perspective in *JAMA*, "the current USMLE 3-digit scores may be distracting the medical education system from the goal of building an innovative, diverse, and resilient physician workforce."⁷

Invitational Conference on USMLE Scoring (InCUS)

The AMA and other leading organizations in medical education convened an invitational conference in March 2019, the Invitational Conference on USMLE Scoring (InCUS), to explore issues around unintended uses of USMLE scores. As noted in a summary report and preliminary recommendations from the meeting, the general consensus among participants is that "[t]he current UME-GME transition system is flawed and not meeting the needs of various stakeholders. Over time, various stakeholder groups have tried to optimize the system for their own purposes, but this has left some, including applicants, with an undue burden and at worst negatively impacted diversity."⁸ One of the recommendations arising from the conference, also noted in the report, is to "[c]onvene a cross-organizational panel to create solutions for the assessment and transition challenges from UME to GME, targeting an approved proposal, including scope/timelines by end of calendar year 2019." As further noted in the report, these challenges would include "[r]educing the number of applications perceived by residency applicants as necessary to obtain a position," "[i]mproving Residency Program Directors' ability to more holistically evaluate candidates," and "[i]mproving the trust of school-based assessments for residency screening and selection."

During the ensuing public comment period, the Council on Medical Education developed and submitted comments on the InCUS recommendations; key points included the following:

- The overemphasis on USMLE performance in the residency application process is unacceptable; a single three-digit score detracts from learning and engaging fully in the medical student experience, and may inhibit schools' implementation of curricular innovation. A holistic approach to assessing applicants, in contrast, with attention given to life experience and emotional intelligence, among other qualities, allows for individual talents to emerge and minimizes the impact of any one point, and may help increase the number of successful applicants from racial/ethnic minority populations.
- Any changes made to the residency application process need to consider the alternative tools for evaluation that remain. Preclinical grades, clinical rotation evaluations, and school-based assessments such as the MSPE/Dean's letter all have considerable shortcomings. Equally problematic is reliance on the reputation of the medical school, which is often determined by research dollars, not the quality of the teaching. Removing the numerical score may discriminate against medical students from new and lesser known U.S. medical schools and U.S. students attending international schools.
- All stakeholders in the process will need to "give" something as part of this transition. For example, students will need to be limited on the number of applications they submit, accrediting bodies (e.g., ACGME, LCME) will need to prohibit the use of USMLE as a program-level metric, and we need to reexamine the Match to see if it is really meeting the current needs. For program directors, a move to pass/fail scores may increase the burden they face in evaluating an ever-growing number of candidates.

- The overarching goal of this work needs to be broadened beyond “to decrease reliance on the USMLE Step 1 score for residency screening” and more toward “to improve and enhance the holistic evaluation of resident applicants.”

The dialogue leading to the Council’s response encompassed a rich and robust exchange of viewpoints among Council members—reflecting the complexity of these issues and the multiple levers, processes, and people affected by “the system” (including, and most importantly, our patients). Through the Council on Medical Education and senior staff, the AMA will continue to monitor, provide feedback on, and report back to the HOD on the status of outcomes from InCUS.

Additional issues in the UME/GME transition were limned in a forum hosted by the Council on Medical Education during the AMA’s 2019 Annual Meeting. These include:

For students:

- The need for honest self-reflection and assessment of strengths and weaknesses.
- The need for honest and effective coaching and mentoring.

For medical schools:

- The need for transparency, accuracy, and honesty in assessments of students.
- The need to balance the responsibility to students (to help them successfully match) with the responsibility to residency programs (to be honest about students’ strengths and weaknesses).
- The fear of unsuccessful matches reflecting poorly on the institution.
- “Failure to fail” (that is, the failure to fail those students who should not be advanced).

For residency program directors:

- The need to provide feedback to schools about interns’ performance.
- The growing popularity of the “residency boot camp” model (e.g., the Resident Prep Curriculum, a weeklong boot camp to help ease the transition into surgical residency⁹).
- The need for a more holistic review of applications and less reliance on USMLE scores.

Overall:

- Inadequacy of the medical student performance evaluation (MSPE) to distinguish among applicants to residency (in other words, the “Lake Wobegon” effect).
- The need to move beyond the UME, GME, and CME silos to the lifelong learning model.
- Consider high-frequency, low-stakes assessment models, to look at a learner’s real-time, cumulative trajectory of growth in knowledge, clinical skills, and professionalism.
- Multiple “scouts” evaluating performance in many types of venues/situations (not just clinical), to average out multiple direct observations.
- The need for free flow of information (in particular, the “right” information—i.e., that which is insightful, without being overwhelming, such that the signal to noise ratio becomes weak).
- Lack of trust among all parties and “gaming” the system; the match process, by its very nature, encourages masking faults and flaws. “Warm handoffs” may help increase trust in the system.

ENTRUSTABLE PROFESSIONAL ACTIVITIES

One framework that may provide a more useful assessment of learners to improve the UME/GME transition are the Core Entrustable Professional Activities (EPAs) for Entering Residency of the AAMC. The EPAs “provide expectations for both learners and teachers that include 13 activities that all medical students should be able to perform upon entering residency, regardless of their future career specialty. The guidelines are based on emerging literature documenting a performance gap at the transition point between medical school and residency training.”¹⁰

SUMMARY

The AMA has taken a lead role in improving and easing the transition from UME to GME for learners, program directors, and patients alike. The process has a wide array of variables and stakeholders. Chief pain points are students submitting an inordinate and increasing number of applications in an attempt to match into programs in their chosen fields, and the (mis)use of USMLE Step 1 scores as a primary screening criterion for interviews. The complexity of

the issue demands a wide-ranging solution. Through InCUS and related work, such as the Reimagining Residency initiative, the AMA is working to encourage a transition of the residency application/matching system towards a more holistic evaluation of applicants' full range of competencies and traits that would provide a broader assessment of a student's capabilities and "fit" with a program. In addition, through its Council on Medical Education and its ability to convene key stakeholders involved in medical education, the AMA will continue working to ensure that new residents are ready to undertake the rigors of residency from day one and learn (under supervision) how to serve their patients, from both an individual and a population perspective.

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APPENDIX: Relevant AMA Policy

H-295.895, "Progress in Medical Education: Structuring the Fourth Year of Medical School"

It is the policy of the AMA that: (1) Trends toward increasing structure in the fourth year of medical school should be balanced by the need to preserve opportunities for students to engage in elective clinical and other educationally appropriate experiences.

(2) The third and fourth years as a continuum should provide students with a broad clinical education that prepares them for entry into residency training.

(3) There should be a comprehensive assessment of clinical skills administered at a time when the results can be used to plan each student's fourth-year program, so as to remedy deficiencies and broaden clinical knowledge.

(4) Medical schools should develop policies and procedures to ensure that medical students receive counseling to assist them in their choice of electives.

(5) Adequate and timely career counseling should be available at all medical schools.

(6) The ability of medical students to choose electives based on interest or perceived academic need should not be compromised by the residency selection process. The American Medical Association should work with the Association of American Medical Colleges, medical schools, and residency program directors groups to discourage the practice of excessive audition electives.

(7) Our AMA should continue to work with relevant groups to study the transition from the third and fourth years of medical school to residency training, with the goal of ensuring that a continuum exists in the acquisition of clinical knowledge and skills.

(CME Rep. 1, I-98 Reaffirmed: CME Rep. 9, A-07 Reaffirmed: CME Rep. 01, A-17)

H-295.862, "Alignment of Accreditation Across the Medical Education Continuum"

1. Our AMA supports the concept that accreditation standards for undergraduate and graduate medical education should adopt a common competency framework that is based in the Accreditation Council for Graduate Medical Education (ACGME) competency domains.

2. Our AMA recommends that the relevant associations, including the AMA, Association of American Medical Colleges (AAMC), American Osteopathic Association (AOA), and American Association of Colleges of Osteopathic Medicine (AACOM), along with the relevant accreditation bodies for undergraduate medical education (Liaison Committee on Medical Education, Commission on Osteopathic College Accreditation) and graduate medical education (ACGME, AOA) develop strategies to:

a. Identify guidelines for the expected general levels of learners' competencies as they leave medical school and enter residency training.

b. Create a standardized method for feedback from medical school to premedical institutions and from the residency training system to medical schools about their graduates' preparedness for entry.

c. Identify areas where accreditation standards overlap between undergraduate and graduate medical education (e.g., standards related to the clinical learning environment) so as to facilitate coordination of data gathering and decision-making related to compliance.

All of these activities should be codified in the standards or processes of accrediting bodies.

3. Our AMA encourages development and implementation of accreditation standards or processes that support utilization of tools (e.g., longitudinal learner portfolios) to track learners' progress in achieving the defined competencies across the continuum.

4. Our AMA supports the concept that evaluation of physicians as they progress along the medical education continuum should include the following: (a) assessments of each of the six competency domains of patient care, medical knowledge, interpersonal and communication skills, professionalism, practice-based learning and improvement, and systems-based practice; and (b) use of assessment instruments and tools that are valid and reliable and appropriate for each competency domain and stage of the medical education continuum.

5. Our AMA encourages study of competency-based progression within and between medical school and residency.

a. Through its Accelerating Change in Medical Education initiative, our AMA should study models of competency-based progression within the medical school.

b. Our AMA should work with the Accreditation Council for Graduate Medical Education (ACGME) to study how the Milestones of the Next Accreditation System support competency-based progression in residency.

6. Our AMA encourages research on innovative methods of assessment related to the six competency domains of the ACGME/American Board of Medical Specialties that would allow monitoring of performance across the stages of the educational continuum.

7. Our AMA encourages ongoing research to identify best practices for workplace-based assessment that allow performance data related to each of the six competency domains to be aggregated and to serve as feedback to physicians in training and in practice. (CME Rep. 4, A-14 Appended: CME Rep. 10, A-15)

D-295.317, "Competency Based Medical Education Across the Continuum of Education and Practice"

1. Our AMA Council on Medical Education will continue to study and identify challenges and opportunities and critical stakeholders in achieving a competency-based curriculum across the medical education continuum and other health professions that provides significant value to those participating in these curricula and their patients.

2. Our AMA Council on Medical Education will work to establish a framework of consistent vocabulary and definitions across the continuum of health sciences education that will facilitate competency-based curriculum, andragogy and assessment implementation.

3. Our AMA will continue to explore, with the Accelerating Change in Medical Education initiative and with other stakeholder organizations, the implications of shifting from time-based to competency-based medical education on residents' compensation and lifetime earnings.

(CME Rep. 3, A-14 Appended: CME Rep. 04, A-16)

H-275.953, "The Grading Policy for Medical Licensure Examinations"

1. Our AMA's representatives to the ACGME are instructed to promote the principle that selection of residents should be based on a broad variety of evaluative criteria, and to propose that the ACGME General Requirements state clearly that residency program directors must not use NBME or USMLE ranked passing scores as a screening criterion for residency selection.

2. Our AMA adopts the following policy on NBME or USMLE examination scoring: (a) Students receive "pass/fail" scores as soon as they are available. (If students fail the examinations, they may request their numerical scores immediately.) (b) Numerical scores are reported to the state licensing authorities upon request by the applicant for licensure. At this time, the applicant may request a copy of his or her numerical scores. (c) Scores are reported in pass/fail format for each student to the medical school. The school also receives a frequency distribution of numerical scores for the aggregate of their students.

3. Our AMA will co-convene the appropriate stakeholders to study possible mechanisms for transitioning scoring of the USMLE and COMLEX exams to a Pass/Fail system in order to avoid the inappropriate use of USMLE and COMLEX scores for screening residency applicants while still affording program directors adequate information to meaningfully and efficiently assess medical student applications, and that the recommendations of this study be made available by the 2019 Interim Meeting of the AMA House of Delegates.

4. Our AMA will: (a) promote equal acceptance of the USMLE and COMLEX at all United States residency programs; (b) work with appropriate stakeholders including but not limited to the National Board of Medical Examiners, Association of American Medical Colleges, National Board of Osteopathic Medical Examiners, Accreditation Council for Graduate Medical Education and American Osteopathic Association to educate Residency Program Directors on how to interpret and use COMLEX scores; and (c) work with Residency Program Directors to promote higher COMLEX utilization with residency program matches in light of the new single accreditation system. (CME Rep. G, I-90 Reaffirmed by Res. 310, A-98 Reaffirmed: CME Rep. 3, A-04 Reaffirmed: CME Rep. 2, A-14 Appended: Res. 309, A-17 Modified: Res. 318, A-18 Appended: Res. 955, I-18)

**6. VETERANS HEALTH ADMINISTRATION FUNDING OF GRADUATE MEDICAL EDUCATION
(RESOLUTION 954-I-18)**

Reference committee hearing: see report of Reference Committee C.

**HOUSE ACTION: RECOMMENDATIONS ADOPTED AS FOLLOWS
IN LIEU OF RESOLUTION 954-I-18
REMAINDER OF REPORT FILED**
See Policy D-510.990

INTRODUCTION

Resolution 954-I-18, introduced by the American Academy of Dermatology, American Society for Dermatologic Surgery Association, and American Society of Dermatopathology, asked that our American Medical Association (AMA):

1. Continue to support the mission of the Department of Veterans Affairs Office of Academic Affiliations for expansion of graduate medical education (GME) residency positions;
2. Collaborate with appropriate stakeholder organizations to advocate for preservation of Veterans Health Administration (VHA) funding for GME and support its efforts to expand GME residency positions in the federal budget and appropriations process; and
3. Oppose service obligations linked to VHA GME residency or fellowship positions, particularly for resident physicians rotating through the VA for only a portion of their GME training.

The AMA House of Delegates adopted Resolves 1 and 2; these were appended to Policy D-510.990, “Fixing the VA Physician Shortage with Physicians.” Resolve 3, which was referred, is the topic of this report.

Testimony before the reference committee on this resolution was mixed. The AMA has long been an advocate for preservation and expansion of GME funding to mitigate projected physician shortages and ensure that positions are available for medical school graduates applying to residency programs. Currently, there are no residency completion service obligations for Veterans Administration (VA) residency programs. Furthermore, it was noted that all funding for residency/fellowship positions, whether from private, VA, and/or Centers for Medicare & Medicaid Services (CMS) sources, carries with it the expectation that residents/fellows perform service for patients during their years in the training program. In addition, the VA sponsors very few residency programs; most residents who train in a VA facility do so as part of their training, with other sites and institutions responsible for components of the residency or fellowship. Due to the complicated rules at institutions that sponsor residency programs related to full funding for a resident full-time employee, it was recommended that Resolve 3 be referred for further study.

BACKGROUND

The Department of Veterans Affairs (VA) has long supported the training of health care professionals as part of its mission. With very few exceptions, the VA does not sponsor and operate its own GME programs, but instead partners with teaching hospitals to provide rotations in VA medical facilities, sharing the costs of faculty and residents when residents are training in VA facilities. When a resident is training at a VA facility, that resident is not counted as part of the Medicare GME cap for the sponsoring institution (and so is not paid via Medicare). This allows the sponsoring institution to train additional residents above its Medicare cap. Over 43,000 residents and fellows rotate through roughly 11,000 VA-funded full-time-equivalent residency positions in VA medical facilities each year; while rotating through the VA, residents remain employees of the sponsoring institution and are not employees of the VA, nor are they subject to service obligations upon completion of the rotation or training program.¹ Approximately one third of the entire GME workforce per year receives training in VA facilities and provides care to veterans.²

VA GME Expansion

The Veterans Access, Choice, and Accountability Act (VACAA) of 2014 included a requirement that the VA expand the number of residents and fellows it trains by up to 1,500 positions by 2024, in selected specialties and/or geographic

areas, as well as specialties designated as critical need specialties located within health professional shortage areas (as defined by the Health Resources and Services Administration), having a shortage of physicians, rural locations, or in a program/area where there are significant delays in veteran access to care.³ After five rounds, the VA has approved 1,055 positions, from 2015 through 2019 (443.2 in primary care, 229.1 in mental health, and 383.0 in critical need specialties).⁴

Subsequent legislation introduced in 2017, but not passed, also increased the number of GME positions funded by the VA by 1,500, but required a service obligation post-GME equal to the number of years of residency stipend and benefit support.^{5,6}

The VA Maintaining Internal Systems and Strengthening Integrated Outside Networks (MISSION) Act of 2018 builds upon VACAA in that one of its aims is to increase GME in rural locations, an area in which VACAA has had limited success.⁴ The MISSION Act will enable the VA to place at least 100 residents (through positions created by VACAA) in “covered” federal facilities, that may not be on a traditional VA campus. Indian Health Service facilities, Federally Qualified Health Centers, Department of Defense medical centers, or other underserved VA areas are included as sites for potential GME expansion. The MISSION Act also provides the VA authority to assist in the development costs of starting new GME programs in VA-designated underserved areas. Finally, the MISSION Act includes provisions to enable the VA to recruit physicians and dentists into rural and underserved areas through two scholarship opportunities and a loan repayment program. The Health Professions Scholarship Program (HPSP) will offer scholarships to medical and dental students in exchange for VA service, with a repayment period of 18 months per year of support. Upon completion of training, the participants will be assigned by the VA to areas experiencing a critical need in the specialty of training. The number of scholarships to be funded will be based on VA-determined provider shortages.⁷

A second scholarship opportunity provides four years of tuition, fees and stipend support to two veterans at nine medical schools:

- Charles R. Drew University of Medicine and Science (California)
- Howard University College of Medicine (District of Columbia)
- Morehouse School of Medicine (Georgia)
- Wright State University Boonshoft School of Medicine (Ohio)
- University of South Carolina School of Medicine
- East Tennessee State University James H. Quillen College of Medicine
- Meharry Medical College (Tennessee)
- Texas A&M Health Science Center College of Medicine
- Joan C. Edwards School of Medicine at Marshall University (West Virginia)

After completion of residency or fellowship, the recipient of the scholarship is required to practice in a VA facility for four years.⁷

The Specialty Education Loan Repayment program offers \$40,000 in loan repayment to residents (who have at least two or more years left of training) in exchange for 12 months’ service post-GME in a VA medical center or site, with a maximum of \$160,000 loan repayment. Preferences will be given to veterans, residents training in rural areas or in the Indian Health Services, or in sites in underserved areas. Rather than an assignment by the VA, recipients in the loan repayment program can select from a list of approved sites the location of the VA site for their service obligation.⁷

To date, the Specialty Education Loan Repayment program has been enacted. The scholarship opportunity for recently separated military veterans attending selected medical schools will be offered to the medical school class of 2020, as a trial, with hope of its continuation. The language for the HPSP scholarship opportunity is currently in development and not yet published for public comment. It is anticipated that the GME expansion in “covered” facilities, as well as the creation of new GME programs in Indian Health Service (IHS) and tribal facilities, will not be underway until at least 2022.⁸

RELEVANT AMA POLICY

D-510.990, “Fixing the VA Physician Shortage with Physicians”

Our AMA will: (1) work with the VA to enhance its loan forgiveness efforts to further incentivize physician recruiting and retention and improve patient access in the Veterans Administration facilities; (2) Call for an immediate change

in the Public Service Loan Forgiveness Program to allow physicians to receive immediate loan forgiveness when they practice in a Veterans Administration facility; (3) Work with the Veterans Administration to minimize the administrative burdens that discourage or prevent non-VA physicians without compensation (WOCs) from volunteering their time to care for veterans; (4) (a) continue to support the mission of the Department of Veterans Affairs Office of Academic Affiliations for expansion of graduate medical education (GME) residency positions; and (b) collaborate with appropriate stakeholder organizations to advocate for preservation of Veterans Health Administration funding for GME and support its efforts to expand GME residency positions in the federal budget and appropriations process.

SUMMARY AND RECOMMENDATIONS

The health care system of the VA is the largest system in the U.S. Not only does the VA provide training opportunities for over 43,000 residents and fellows, it also has collaborative agreements with 178 allopathic and osteopathic medical schools, providing educational opportunities for nearly 25,000 medical students and other health professions trainees⁷ (who are not subject to service obligations upon completion of the rotation or training program). As such, the importance and value of the VA to the nation's health care workforce cannot be overstated.

While other sources of financing for more GME positions have been limited, the VA's ability to expand may reduce the effects of a forecasted physician shortage. Recently passed legislation that enables the VA to expand opportunities for physician training within the VA, and to provide financial assistance to eligible physicians who will then repay that assistance through service obligation to VA and other underserved populations, will further one of the statutory missions of the VA, which is to assist in the training of health professionals for its own needs and those of the nation.

The Council on Medical Education therefore recommends that the following recommendations be adopted in lieu of Resolution 954-I-18 and the remainder of this report be filed:

1. That our AMA support postgraduate medical education service obligations through programs where the expectation for service, such as military service, is reasonable and explicitly delineated in the contract with the trainee.
2. That our American Medical Association (AMA) oppose the blanket imposition of service obligations through any program where physician trainees rotate through the facility as one of many sites for their training.

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