



September 13, 2018

Human Services Department
Office of the Secretary
Attn: Medical Assistance Division Public Comments
P.O. Box 2348
Santa Fe, NM 87504-2348

Public Comment Re: Proposed Revisions - 8.311.3 NMAC, Methods and Standards for Establishing Payment – In-Patient Hospitals

Dear Secretary Earnest:

Memorial Medical Center is in favor of the Regulation revision that adds language in the Indirect Medical Education (IME) section that amends the current 125 resident limit for IME eligibility:

Pages 8-9 Proposed Regulations:

“(6) IME adjustment: Effective August 1, 1992, each acute 8.311.3 NMAC 9 care hospital that qualifies as a teaching hospital will receive an IME payment adjustment, which covers the increased operating or patient care costs that are associated with approved intern and resident programs. The IME payment adjustment is subject to available state and federal funding, as determined by the department and shall not exceed any amounts specified in the Medicaid state plan.

(a) In order to qualify as a teaching hospital and be deemed eligible for an IME adjustment, the hospital must:

- (i) be licensed by the state of New Mexico; and
- (ii) be reimbursed on a DRG basis under the plan; and
- (iii) have 125 or more full-time equivalent (FTE) residents enrolled in approved teaching programs[.] or operate a nationally-accredited primary care residency program.”

This amendment appears to expand eligibility for IME payments to additional hospitals in the state roster assuming they have ACGME-accredited programs. If so, it would provide for supporting existing residency training programs in Albuquerque, Las Cruces, Santa Fe and other places as well as allow for potential Medicaid GME payments in support of future ACGME-accredited training locations.

If this is not the case, we would suggest changing the proposed regulations to ensure that all DRG Hospitals (PPS-exempt hospitals) that operate an ACGME-accredited primary care residency program, be made eligible for IME support.

The proposed changes above will serve to enhance training in urban settings in NM. This is an important concept if the state is to address the overall shortage of primary care providers and physician shortages in general. Thank you for the opportunity to provide comments on these proposed regulations. We think this is a first step in improving primary care and other physician supply to meet the needs of Medicaid patients in New Mexico.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Harris", is written over the word "Sincerely,".

John Harris, Chief Executive Officer
Memorial Medical Center