

## Review and Comment Form

The ACGME invites comments from the community of interest regarding the proposed requirements. Comments must be submitted electronically and must reference the requirements by line number and requirement number. **For focused revisions, only the section(s) of the requirements that is being revised is open for review and comment.**

Organizations submitting comments should indicate whether the comments represent a consensus opinion of its membership or whether they are a compilation of individual comments.

Title of Program Requirements	<i>Program Requirements for Graduate Medical Education in the Subspecialties of Pediatrics</i>
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Select [X] only one	
Organization (consensus opinion of membership)	<input checked="" type="checkbox"/>
Organization (compilation of individual comments)	<input type="checkbox"/>
Review Committee	<input type="checkbox"/>
Designated Institutional Official	<input type="checkbox"/>
Program Director in the Specialty	<input type="checkbox"/>
Resident/Fellow	<input type="checkbox"/>
Other (specify):	<input type="checkbox"/>

Name	Angela L. Myers and Franklin Trimm
Title	Myers: Chair, Association of Pediatric Program Directors (APPD) Fellowship Program (FPD) Executive Committee, and Trimm: President, APPD and Chair of APPD Board of Directors
Organization	APPD

Add rows as necessary.

	Program Requirement Reference	Comment(s)
1	Line number(s): [90-94]  Requirement number: [1.A.4]	The recommended changes to FPD protected time are based on data from a national survey of FPD currently allotted time to administrate their program and the amount of time they believe is necessary to administrate a successful program that provides optimal educational content for trainees and remains in compliance with ACGME standards. The data supports the changes made by the ACGME, and we wholeheartedly support these proposed changes.
2	Line number(s): [96-98]  Requirement number: [1.A.5]	The majority of pediatric fellowship programs have a fellowship coordinator for some allotted time. Although, we did not find that the presence of a coordinator decreased the time needed by the PD, we view them as an essential part of a fellowship program and support the ACGME proposed changes.

	<b>Program Requirement Reference</b>	<b>Comment(s)</b>
<b>3</b>	Line number(s): [349]  Requirement number: [II.B.2]	The wording of this statement is not clear. We would recommend: "certification, if eligible, by the appropriate member board of the American Board of Medical Specialties (ABMS); or," (Core)
<b>4</b>	Line number(s): [767-70]  Requirement number: [IV.A.5.a).(2).(a)]	We ask again that the ACGME consider changing the wording to PD <u>ensures</u> documentation of the procedures, rather than the PD documents the procedures. This skill set of managing one's own procedural log is felt to be part of the subspecialty fellows' training experience and inherent in the Professionalism competency.
<b>5</b>	Line number(s): [991-6]  Requirement number: [IV.A.6.a).(3)]	We believe that there is a word missing in this statement: "Fellow education <u>must include</u> <u>instruction</u> in basic and fundamental ??, as appropriate <u>to each subspecialty</u> , such as anatomy, physiology, biochemistry, embryology, pathology, microbiology, pharmacology, immunology, genetics, and 995 nutrition/metabolism. (Core)  We believe the statement is intended to read: "Fellow education must include instruction in basic science knowledge appropriate to each subspecialty..."
<b>6</b>	Line number(s): [1019-20]  Requirement number: [I.A.6.b)]	It seems that the 's' should be removed from the word allows, in order for this statement to make sense.  "A structured curriculum must be provided to allow fellows to participate in the following activities:"
<b>7</b>	Line number(s): [1652-54]  Requirement number: [VI.G.6.a)]	We recommend clarification of the below statement in the glossary of terms to better define night float, night shift, and night service. This will serve to enhance understanding of these terms among program directors.  We recommend revisions to the ACGME Glossary of Terms to delineate the differences between Night Call (episodic night time coverage, no more than 1 in 3), Night Float (defined in glossary) and Night Service/Shift (consecutive days of duty that occur at night with no daytime responsibilities). These are clarified in a FAQ (FAQ 07012013), but it would be helpful to have these added to the Glossary of Terms.  "Fellows should not have more than four total weeks of night float per year, and night float should not be scheduled in consecutive weeks"

	Program Requirement Reference	Comment(s)
8	Line number(s): [1076] IV.B.2.b	<p>It is important to define the scholarship oversight committee.</p> <p>Add as subsection to IV.B.2.b. This committee should consist of three or more individuals, at least one of whom is based outside the subspecialty discipline; the fellowship director may serve as a trainee's mentor and participate in the activities of the committee, but should not be a standing (i.e., voting) member.</p> <p>Consider adding full details of the committee (just like the PEC and CCC). However, this would require reworking of the other requirements</p> <p><i>This committee should</i></p> <ul style="list-style-type: none"> <li>• <i>Determine whether a specific activity is appropriate to meet the ABP guidelines for scholarly activity</i></li> <li>• <i>Determine a course of preparation beyond the core fellowship curriculum to ensure successful completion of the project</i></li> <li>• <i>Evaluate the fellow's progress as related to scholarly activity</i></li> <li>• <i>Meet with the fellow early in the training period and regularly thereafter</i></li> <li>• <i>Require the fellow to present/defend the project related to his/her scholarly activity</i></li> <li>• <i>Advise the program director on the fellow's progress and assess whether the fellow has satisfactorily met the guidelines associated with the requirement for active participation in scholarly activities</i></li> </ul>
9	Line(s): 1082 Requirement: IV.B.2.c.1	<p>.....and presentation of results to the scholarship oversight committee.</p> <p>We recommend that this be included regardless of whether or not the language in the proposed edit above is accepted and incorporated into the document.</p>
10	Line number(s): [573-578 ] Requirement number: [III.A.2 ]	<p>We ask that you delete the new language pertaining to the types of residency programs routinely permitted to apply to pediatric subspecialties. The new language allows trainees only from pediatrics and medicine/pediatrics combined residencies. However, Adolescent Medicine is not only a recognized subspecialty for the American Board of Pediatrics – it</p>

Program Requirement Reference	Comment(s)
	is also a recognized subspecialty of the American Board of Internal Medicine, and a certificate of added qualification for the American Board of Family Medicine. Although generally situated in Departments of Pediatrics, adolescent medicine fellowship training programs routinely include trainees who have completed internal medicine and family medicine residencies. We respectfully request that the ACGME not specify a pediatric or med-peds residency, so that Adolescent Medicine Training Programs can continue to train graduates of internal medicine and family medicine residencies.

General Comments:

These recommendations are humbly submitted on behalf of the entire APPD FPD Executive Committee and by the APPD Board of Directors. We would be delighted to assist with any clarification of our recommendations.