

October 2, 2010

Nicole Patterson
Office of Shortage Designation
Bureau of Health Professions
Health Resources and Services Administration
Room 91-18, Parkland Building
5600 Fishers Lane
Rockville, Maryland 20857

Re: 42 CFR Part 5

Negotiated Rulemaking Committee on Designation of Medically Underserved Populations and Health Professional Shortage Areas

Dear Committee Members:

Insofar as your meeting on October 13-15, 2010 is to establish a comprehensive methodology and criteria for Designation of Medically Underserved Populations and Health Professional Shortage Areas, in the hope that the process will yield a new rule in accordance with Section 5602 of the Patient Protection and Affordable Care Act of 2010 (PPACA), we, the Integrated Healthcare Policy Consortium, wish to provide these comments for your consideration.

Primarily we wish to remind you of the new definition of the healthcare workforce in PPACA and the need to include all providers (including licensed naturopathic physicians, chiropractors, acupuncturists, professional midwives and massage therapists) when considering how to count and how to designate underserved populations and professional shortage areas.

This definition is in Section 5101. National Health Care Workforce Commission:

“Health Care Workforce – The term ‘health care workforce’ includes all health care providers with direct patient care and support responsibilities, such as physicians, nurses, nurse practitioners, primary care providers, preventive medicine physicians, optometrists, ophthalmologists, physician assistants, pharmacists, dentists, dental hygienists, and other oral healthcare professionals, allied health professionals, doctors of chiropractic, community health workers, health care paraprofessionals, direct care workers, psychologists and other behavioral and mental health professionals (including substance abuse prevention and treatment providers), social workers, physical and occupational therapists, certified nurse midwives, podiatrists, the EMS workforce (including professional and volunteer ambulance personnel and firefighters who perform emergency medical services), licensed complementary and alternative medicine providers, integrative health practitioners, public health professionals, and any other health professional that the Comptroller General of the United States determines appropriate.”

Thank you for the opportunity to submit these comments.

Sincerely,

Michael Traub, ND

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Federal Policy Committee
Integrated Healthcare Policy Consortium
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