

IMG TASKFORCE

INTERNATIONAL MEDICAL GRADUATE TASKFORCE

November 5, 2010

RE: Public Comment Submitted to Negotiated Rulemaking Committee on Designation of Medically Underserved Populations and Health Professional Shortage Areas

Via Electronic Mail (Npatterson@hrsa.gov) and U.S. Mail

Attn: Ms. Nicole Patterson, Public Health Analyst

Office of Shortage Designations

Bureau of Health Professions

Health Resources and Services Administration

Room 9A-18

Parklawn Building

5600 Fishers Lane

Rockville, MD 20852

Dear Committee Members:

The International Medical Graduate (IMG) Taskforce submits the following comments to the Negotiated Rulemaking Committee on Designation of Medically Underserved Populations and Health Professional Shortage Areas.

In light of our mission, the IMG Taskforce will focus our comments on the particular issues raised by the work of your committee affecting physicians who are International Medical Graduates, sometimes informally referred to as “foreign doctors.” The International Medical Graduate (IMG) Taskforce comprises professionals in medicine and law who are dedicated to helping Americans in rural and other physician-shortage areas obtain the basic medical services they so desperately need and deserve. Among other goals, we strive to educate national and state policy makers, administrative officials, and the American public on the need for fair and reasonable laws for allowing international medical graduates to become licensed as physicians and to begin or continue their medical careers in the United States. We work on behalf of universities, teaching hospitals, medical centers, and clinics of all sizes, and on behalf of international medical graduates seeking necessary authorizations. Ultimately, we seek to ensure that Americans in underserved areas and underserved populations of the United States receive adequate health care services.

IMG physicians have traditionally provided a gap-filling role in the United States healthcare system, as many committee members are likely aware. The ability of IMG physicians to continue to fulfill this role is predicated in large part upon the important work of this committee. We therefore thank you for the deliberations you are about to

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

November 5, 2010

Page 2 of 2

undergo, in addition to our appreciation for the prior efforts you have provided, as reflected by your inclusion in this esteemed committee.

While we are attorneys, rather than policy experts, we humbly forward suggestions that may help IMG physicians to continue and expand their service to medically underserved Americans. We would forward the following concepts for inclusion in your committee's deliberations regarding HHS/HRSA shortage designations:

- incorporation of Medicare and/or Medicaid populations as their own distinct, medically underserved population group, in addition to the current "low-income" designation;
- provision of "grandfathering" mechanisms for facilities that are currently including located in HHS/HRSA shortage designation, to provide for continuity of care by current safety-net providers; and
- expansion of categories of practice-based designated shortage areas, to include key specialties in addition to primary care, mental health care and dental care.

As attorneys specializing in healthcare immigration law, we would like extend to an open-ended offer of our organization and its membership as a resource to your committee in its on-going deliberations. HRSA shortage designation areas constitute a lynchpin of programs that permit IMG physicians to serve the medically underserved within the United States – programs such as the Conrad 30 Waiver Program and the Physician National Interest Waiver Program. The designation areas also constitute an important part of healthcare provisions within pending immigration reform legislation. To the extent that we can be of help in discussion of the utilization of IMG physicians in the greater policy goals implicated in this committee's work, please do not hesitate to contact us.

Sincerely,

/S/

Kristen A. Harris

Advocacy Committee Chair, International Medical Graduate Taskforce

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