

December 1, 2010

The Honorable Kathleen Sebelius
Secretary of U.S. Department of Health & Human Services
200 Independence Ave., SW
Washington, DC 20201

RE: Notice of Proposed Rulemaking -- Designation of Medically Underserved Populations
and Health Professional Shortage Areas

Dear Secretary Sebelius:

We are pleased to provide the below comments from Broadlawns Medical Center regarding the negotiated rulemaking committee (or the NPRM2) on the methodologies used to determine Health Professional Shortage Areas (HPSAs) and Medically Underserved Populations (MUPS). We appreciate your continued commitment to the primary care needs of all citizens especially those in vulnerable populations who often struggle with access to care.

History/Mission

Broadlawns Medical Center (BMC) is a county-owned hospital, established over eighty-five years ago by Iowa law. BMC provides care to sick and indigent residents of Polk County without regard for their ability to pay. BMC is a public resource for the community whose primary mission is to meet the health care needs of all Polk County residents by providing primary and preventive health services to underserved populations. Consequently, BMC is the primary safety net provider in Polk County providing over one-third of all the care to the uninsured in Polk County.

Capacity

Broadlawns Medical Center provides basic primary care, hospital, and emergency services. BMC operates an acute care hospital licensed for 200 beds serving medical, surgical, pediatric, and psychiatric patients, and physician practices overseeing numerous clinics and outpatient services. The Medical Center includes the following primary care clinics:

1. The Primary Medical Care Group, which serves as a medical home and provides continuity of care to patients
2. The Diagnostic Clinic
3. The Family Health Center – Family Medicine Residency Clinic
4. Dental Clinic, which qualifies and is currently part of the National Service Corp.

BMC also provides both inpatient and outpatient psychiatric services, including targeted case management for adults with chronic mental illness, group therapy and two group homes for adults with chronic mental illness.

The Broadlawns Medical Center Family Medicine Residency Program is one of the largest Residency programs in the State. One of the key objectives for our Residency Program is to provide Primary Health Care Physicians to the Rural Communities of Iowa. (See Exhibit A). Our Residency Program has become a key player in ensuring that all residents of Iowa have access to basic Primary Health Care services. On average, two-thirds of all the Residents who graduate from our Residency Program stay and practice in Iowa, many of them in rural areas of our State.

Finally, the Central Iowa-Area Health Education Center (CI-AHEC) is hosted by Broadlawns Medical Center and serves an eight county catchment area. CI-AHEC has worked extensively within the Des Moines University AHEC Program to recruit personnel, establish an advisory board, complete a needs assessment, develop a strategic plan, and implement programs and activities. CI-AHEC is successfully introducing K-12 students to healthcare careers, facilitating health profession student clinical experiences, and offering continuing education to practicing providers throughout the designated geographic service area.

Through our Family Medicine Residency Program and the CI- AHEC Program Broadlawns is certain we can further improve Iowa's supply, distribution, diversity, and quality of health care providers and professionals.

Recommendation Regarding the Proposed Methodology

Given the current and projected healthcare workforce shortages, gains in Iowa's diverse populations, barriers in access to healthcare, and the aging of rural Iowa residents we fully embrace the National Service Corps efforts regarding the proposed methodology to ensure overall recruiting, training, and retaining healthcare providers to rural and underserved areas of Iowa.

However, Broadlawns, as the largest Safety Net Provider in Iowa and as one of the largest Primary Care Teaching programs in Iowa, does not meet the current HRSA Medically Underserved Methodology. In fact, if Broadlawns Medical Center was across the street, we would qualify to be part of the National Service Corp for both primary care and psychiatric care providers. Over the course of the last 9 years, Broadlawns has repeatedly had conversations with the State of Iowa and our Congressional delegation as a Disproportionate Share Hospital (DSH) we seek your support in requesting similar treatment to the Federally Qualified HealthCare Centers.

We are supportive of the rules for a new designation of "safety net" providers who serve high-need populations but do not meet the other eligibility criteria. The description that was included, with discussion of uninsured patients and those under 200 percent of the poverty level adequately describes an organization such as Broadlawns. In fact, almost 56% of all the care provided at Broadlawns Medical Center is provided to families who would fall into the 200% or less of the FPL. An automatic-HPSA designation for "Safety Net" would be a great addition to ensuring we can meet the current and

future needs of providing both Primary and Psychiatric Care to Rural Iowa. In addition, this would assist Broadlawns Medical Center in being able to recruit and retain Primary and Psychiatric Providers to the largest and most vulnerable population in our community and State.

Broadlawns Medical Center supports HRSA designation and the current proposed language to create a new designation of "Safety Net" provider for the National Service Corp. We strongly support Broadlawns Medical Center in its continued effort to provide care to the uninsured, as well as provide future healthcare professionals for our State.

Sincerely,

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