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March 27, 2025

To: Zachary Garceau
Department of Health
Via: zachary.garceau@health.ri.gov

From: Elena Nicolella
RIHCA President and CEO
ENicolella@rihca.org

Re: **Proposed Adoption: Primary Care Training Sites Program 216-RICR-20-15-10**

The Rhode Island Health Center Association submits the following comments:

10.3 Definitions
A.14: Definition of "Student Enrollee"
This definition appears limited to graduates of medical school. We recommend that the definition be revised to reflect students who have not yet graduated. We also recommend that the definition be more inclusive of the clinical education experience of nurse practitioners and physician assistants.

10.4.2 Selection Process/Criteria
B.3 The requirement that the training program at the primary care site is accredited will limit the eligible training sites. We recommend offering training sites alternatives to accreditation. This section should also be revised to reflect the comment above.

Please contact me if you have any questions or require clarification.