



AMERICAN ASSOCIATION OF
COLLEGES OF OSTEOPATHIC MEDICINE

OFFICE OF THE PRESIDENT

Statement for the Record
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U.S. Department of Education
Public Hearing on Notice of Proposed Rulemaking on
Program Integrity: Gainful Employment
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On behalf of the American Association of Colleges of Osteopathic Medicine (AACOM), I am pleased to present on our recently submitted comments to the U.S. Department of Education on its Notice of Proposed Rulemaking on Program Integrity: Gainful Employment. AACOM represents the administrators, faculty, and students of the nation's 26 colleges of osteopathic medicine and four branch campuses that offer the doctor of osteopathic medicine degree. Today, more than 18,000 students are enrolled in osteopathic medical schools. More than 20 percent of U.S. medical students are training to be osteopathic physicians.

AACOM commends the Secretary for proposing rules that are designed to promote the principles of the Title IV student financial aid programs, and for understanding the importance of accountability. We recognize that appropriate oversight is a fundamental function of the Department to ensure that federal funding is being appropriately allocated--and we thank the Department for its leadership on this important matter.

During a time when our nation faces a critical and growing shortage of physicians, particularly in the area of primary care, AACOM asks the Department to take into consideration the factors that are unique to medical education. Medical students follow a common sequence of coursework, clinical training, internship/residency, and national board exams, regardless of whether they attend a public, nonprofit, or for-profit medical school. Typically, students spend their first and second years of medical school in classrooms and laboratories, and their third and fourth years on clinical rotations. Each osteopathic medical student must pass three separate national exams in order to graduate. However, upon graduation, medical students cannot begin practice; they must undergo an additional three-seven years of graduate medical education training depending on their speciality and then take additional national board and certifying exams. During internship and residency, students earn a stipend; however, that income generally is not sufficient to provide financial resources to begin significant payment of educational loans, and it certainly is not indicative of the future practicing physician's salary. We hope that the Department recognizes the

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special educational process that is unique to medical education and gains understanding of the negative impact this proposed rule could have if applied to U.S. medical schools.

While AACOM has concerns with the potential impact of the proposed regulation on all U.S. medical schools, we understand that the proposed regulation would affect only for-profit medical schools. One AACOM member institution that would be affected, Rocky Vista University College of Osteopathic Medicine, filed comments on August 26th with the Department on this proposed rule. AACOM supports their submitted comments, and would like to draw your attention to them as illustrative of the problem the regulation would pose for all U.S. medical schools. AACOM has serious concerns that if these regulations were applied to non-profit as well as for-profit U.S. medical schools, essentially all schools would be deemed ineligible for Title IV student financial aid programs. Therefore, as the implementation process of these regulations continues, AACOM asks the Department to exempt all U.S. graduate terminal degree medical education programs from these regulations.

While AACOM agrees with the Department's statement that "programs offered by the for-profit sector must lead to measureable outcomes," AACOM maintains that the best way to measure the outcome for graduate medical programs is through other means, such as the graduation rates of schools' matriculants, their students' pass rates on national board exams, or employment, income or loan repayment metrics after the completion of specialty training and entry into practice. Income and loan repayment after graduation, during the graduate medical education period, is not an appropriate measure.

Thank you for the opportunity to offer public comments on this issue. AACOM looks forward to working closely with the Department to ensure the responsible and productive utilization of Title IV student financial aid programs by U.S. medical schools and their students.