

July 15, 2021

The Honorable Diana DeGette  
U.S. House of Representatives  
2111 Rayburn House Office Building  
Washington, DC 20515

The Honorable Fred Upton  
U.S. House of Representatives  
2183 Rayburn House Office Building  
Washington, DC 20515

Dear Representatives DeGette and Upton,

On behalf of the American Association of Colleges of Osteopathic Medicine (AACOM), thank you for the opportunity to provide comments in response to the 21st Century Cures 2.0 discussion draft.

Osteopathic medicine plays an essential role in the fabric of our healthcare system and is a growing field. Founded in 1898 to support and assist the nation's osteopathic medical schools, AACOM represents all 37 colleges of osteopathic medicine (COMs)—**educating nearly 31,000 future physicians, 25 percent of all U.S. medical students**—at 58 teaching locations in 33 U.S. states, as well as osteopathic graduate medical education professionals and trainees at U.S. medical centers, hospitals, clinics, and health systems.

As you develop bipartisan proposals to build upon successes in the *21st Century Cures Act*, AACOM encourages you to seek continuous input from the osteopathic community. We strongly recommend that the Cures 2.0 legislation address the following urgent needs.

- Permanent eligibility for designated health professions students to administer vaccinations under supervision in the event of any future public health emergencies (PHEs)
- Enhanced research opportunities for osteopathic medical schools by supporting programs that assist osteopathic institutions with building research capacities and infrastructure

**AACOM Recommendation: Permanent Eligibility for Health Professions Student Vaccinators**

***Discussion Draft Section 102: National Testing and Response Strategy for Future Pandemics***

[Students Assist America \(SAA\)](#), an interprofessional initiative of 12 associations spearheaded by AACOM, successfully advocated for a Seventh Amendment to the *Public Readiness and Emergency Preparedness (PREP) Act* authorizing students from designated health professions to administer COVID-19 vaccinations. We applaud the Biden Administration for this important change, which opened the door for almost one million skilled medical, nursing, pharmacy, dental, veterinary, physician assistant, optometry and other health professions students to administer COVID-19 vaccines with supervision.

**AACOM strongly urges Congress to include the *Student Assisted Vaccination Effort (SAVE) Act (S. 2114)* in Section 102, National Testing and Response Strategy for Future Pandemics, in the Cures 2.0 legislation.** The lack of a sufficient workforce hindered the pace of the COVID-19 vaccine rollout. The *SAVE Act* will enable educational institutions to establish mechanisms necessary for rapid deployment and create consistency across states. Introduced by Senators Mark Kelly (D-AZ) and Susan

Collins (R-ME), the *SAVE Act* would permanently authorize health professions students to administer vaccinations and alleviate burdens on the healthcare workforce during future PHEs.

**AACOM Recommendation: Enhance Research Opportunities for Osteopathic Medical Schools**

***Discussion Draft Section 502: Research Investment to Spark the Economy***

There are over 151,000 DOs and osteopathic medical students, and more than 6,500 new osteopathic physicians enter the workforce each year. Over half of osteopathic physicians practice in the primary care specialties of family medicine, internal medicine, and pediatrics, and nearly 40 percent of physicians practicing in medically underserved areas are DOs. Osteopathic physicians focus on treating the whole person and receive 200 hours of additional training in osteopathic manipulative treatment, a hands-on treatment used to diagnose and treat illness and injury. This gives us a unique voice and perspective in the medical community.

However, the clinician workforce and scientists at osteopathic medical schools are underutilized in National Institutes of Health (NIH) funding opportunities and underrepresented on NIH National Advisory Councils and standing study sections. In fact, osteopathic medical schools receive only 0.1 percent of NIH grants and are almost nonexistent on NIH councils and study sections.

**As Congress invests in research to spark the economy, AACOM recommends that Section 502 of the Cures 2.0 legislation:**

- 1) establish a research fund targeting principal investigators employed by colleges of osteopathic medicine;**
- 2) prioritize funding for research projects that incorporate the osteopathic philosophy, osteopathic manipulative treatment and osteopathic manipulative medicine; and**
- 3) execute a plan to increase representation from colleges of osteopathic medicine in all NIH National Advisory Councils and study sections.**

Expanding engagement by osteopathic medical schools and professionals will result in innovative solutions to national healthcare challenges, growth in evidence-based research, and increased translation of discoveries to patient care. Osteopathic medical education investment will advance research in primary care, prevention, and treatment and employ an already diverse physician population that is enriched in socioeconomically disadvantaged underserved and rural communities. Furthermore, research by the osteopathic profession will support robust recovery from the COVID-19 pandemic and address future public health needs.

AACOM appreciates your consideration of these recommendations and looks forward to continuing our work with you. For additional information, please contact David Bergman, JD, Vice President of Government Relations, at [dbergman@aacom.org](mailto:dbergman@aacom.org).

Sincerely,



Robert A. Cain, DO, FACOI, FAODME  
President and CEO