

July 7, 2023

The Honorable Bernard Sanders
Chair
Committee on Health, Education, Labor
and Pensions
U.S. Senate
Washington, DC 20510

The Honorable Bill Cassidy, MD
Ranking Member
Committee on Health, Education, Labor
and Pensions
U.S. Senate
Washington, DC 20510

The Honorable Robert Casey, Jr.
U.S. Senator
Committee on Health, Education, Labor
and Pensions
U.S. Senate
Washington, DC 20510

The Honorable Mitt Romney
U.S. Senator
Committee on Health, Education, Labor
and Pensions
U.S. Senate
Washington, DC 20510

Dear Chairman Sanders, Ranking Member Cassidy, Senator Casey and Senator Romney:

On behalf of the American Association of Colleges of Osteopathic Medicine (AACOM), thank you for the opportunity to respond to the Health, Education, Labor and Pensions (HELP) Committee's Discussion Draft on the reauthorization of *the Pandemic and All-Hazards Preparedness Act (PAHPA)*.

Osteopathic medicine plays a critical role in our nation's healthcare delivery system. Founded in 1898 by the nation's osteopathic medical schools, AACOM represents all 40 accredited colleges of osteopathic medicine (COMs)—educating more than 35,000 future physicians, 25 percent of all U.S. medical students—at 64 teaching locations in 35 U.S. states, as well as osteopathic graduate medical education professionals and trainees at U.S. medical centers, hospitals, clinics and health systems.

As the HELP Committee works toward a bipartisan effort to reauthorize PAHPA, AACOM strongly recommends the discussion draft is revised to:

- Provide permanent eligibility for designated health professions students to administer vaccinations under supervision in the event of any future Public Health Emergency (PHE).
- Include osteopathic representation on existing and new National Advisory Committees, workgroups, and task forces.

AACOM Recommendation: Provide Permanent Eligibility for Health Professions Student Vaccinators

Discussion Draft Section 103: Improving Medical Readiness and Response Capabilities

Section 103 should be amended to include a section providing permanent eligibility for health professions students to administer vaccinations under supervision in the event of any future public health emergency (PHE). The osteopathic community continues to serve on the front lines

of the fight against COVID-19. Since the beginning of the COVID-19 pandemic, osteopathic physicians and students have worked alongside other health professionals as first responders for COVID patients in medical facilities across the country. However, the system was not prepared for the pandemic and changes had to be made in real time to address healthcare delivery deficiencies.

- The lack of a sufficient workforce hindered the pace of the COVID-19 vaccine rollout.
- At the start of the COVID-19 pandemic, AACOM spearheaded an interprofessional initiative of 12 associations to advocate for the Seventh Amendment to the Public Readiness and Emergency Preparedness (PREP) Act, providing immunity from liability and authorizing students from designated health professions to administer COVID-19 vaccinations.¹
- The amendment allowed nearly one million skilled medical, nursing, pharmacy, dental, veterinary, physician assistant, optometry and other health professions students to administer COVID-19 vaccines with training and supervision.
- Unfortunately, the amendment parameters ended with the expiration of the COVID-19 PHE.
- It is imperative that Congress approve legislation to permanently allow qualified health professions students to vaccinate at the outset of future federally declared PHEs to ensure timely delivery of vital health care services. S. 2114, the *Student Assisted Vaccination Effort Act*, from the 117th Congress achieves this outcome.

AACOM Recommendation: Include Osteopathic Representation on National Advisory Committees

Discussion Draft Section 305: National Advisory Committees

Section 305 should be amended to include representation from the osteopathic medical education community to ensure the presence of diverse perspectives and expertise. Serving disadvantaged or vulnerable populations is a key pillar of AACOM and our member schools. That is why Doctors of Osteopathic Medicine (DOs) are uniquely positioned to address healthcare access and related challenges, including those arising during a PHE.

- AACOM and its member institutions have made a concerted effort to promote training in diverse healthcare settings, such as community hospitals and healthcare facilities located in rural parts of the country.
- Sixty percent of osteopathic medical schools are located in health professional shortage areas (HPSAs).
- Sixty-four percent require their students to go on clinical rotations in rural and underserved areas and 88 percent have a stated public commitment to rural health.
- Significantly, more than half (57 percent) of DOs practice in the primary care specialties of family medicine, internal medicine and pediatrics. DOs have increased access to many

¹ U.S. Federal Register, 86 FR 14462, available at <https://www.federalregister.gov/documents/2021/03/16/2021-05401/seventh-amendment-to-declaration-under-the-public-readiness-and-emergency-preparedness-act-for>

underserved populations by providing primary care to rural populations, which serve as the backbone of medical care during PHEs.²

- The connection osteopathic physicians have to serving vulnerable populations, especially those in underserved areas, along with their strong presence in the primary care workforce, offers unique perspective, experience, and expertise that would benefit the National Advisory Committees established in PAHPA.

Thank you for providing the opportunity to share our views and recommendations. We stand ready to serve as a resource and provide additional information and consultation as this process moves forward. If you have any questions or require further information, please contact me at dbergman@aacom.org.

Respectfully,

A handwritten signature in black ink that reads "David A. Bergman". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

David Bergman, JD
Senior Vice President of Government Relations and Health Affairs
American Association of Colleges of Osteopathic Medicine

² American Osteopathic Association, OMP Report, available at <https://osteopathic.org/about/aaa-statistics/>