



AMERICAN ASSOCIATION OF
COLLEGES OF OSTEOPATHIC MEDICINE



June 4, 2013

The Honorable Arne Duncan
Secretary of Education
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202-1510

Via Electronic Submission (regulations.gov)

Dear Secretary Duncan:

On behalf of the American Association of Colleges of Osteopathic Medicine (AACOM) and the Association of American Medical Colleges (AAMC), we are pleased to offer comments on the Department of Education's recent initiative to measure gainful employment and student loan repayment.

AACOM represents the administrators, faculty, and students of the nation's 29 colleges of osteopathic medicine that offer the doctor of osteopathic medicine (D.O.) degree at 37 locations in 28 states. Today, more than 21,000 students are enrolled at osteopathic medical schools, and more than 20 percent of new U.S. medical students are training to be osteopathic physicians. By 2019, that number is expected to grow to 25 percent. The AAMC is a not-for-profit association representing all 141 accredited U.S. medical schools; nearly 400 major teaching hospitals and health systems; and nearly 90 academic and scientific societies. Through these institutions and organizations, the AAMC represents 128,000 faculty members, 75,000 medical students, and 110,000 resident physicians.

AACOM and the AAMC commend the Department for proposing regulations in 2010 designed to promote the principles of accountability in the Title IV student financial aid programs. We recognize that appropriate oversight is a fundamental function of the Department to ensure federal funding is properly allocated. Moreover, we thank the Department for its willingness to provide leadership on this important matter.

At a time when our nation faces a critical and growing shortage of physicians, AACOM and the AAMC ask that the Department, in examining gainful employment and student loan repayment, take into consideration the factors unique to medical education. U.S. medical students follow a common sequence of course work, clinical training, and national board exams, regardless of whether they attend a public, non-profit, or for-profit medical school. Following graduation, physicians cannot begin to practice until they complete additional graduate medical education training, which takes between three and seven years (depending upon their field of specialty) and pass additional national licensure exams.

The unique process of medical education can pose a significant financial burden to medical students who risk large amounts of debt and rely on various federal loan options. During residency training, physicians earn a stipend; however, that income is generally not sufficient to begin full repayment of educational loans, and is certainly not indicative of the future practicing physician's salary. As a result, medical residents depend on federal financial aid programs such as forbearance and income-based repayment to postpone or reduce their obligations until they become licensed physicians. Under the proposed gainful employment rule, borrowers who participate in these repayment programs after graduation would be not counted as repaying their loans nor as gainfully employed.

While AACOM and the AAMC understand that the 2010 proposed regulation would only affect for-profit medical schools, we have concerns with the potential non-regulatory impact of misleading repayment measurement on all U.S. medical schools. We further caution that if these regulations are applied to the non-profit as well as for-profit U.S. medical schools, potentially all institutions would be deemed ineligible for Title IV student financial aid programs.

While AACOM and the AAMC agree with the Department's statement that "programs offered by the for-profit sector must lead to measureable outcomes, or those programs will devalue postsecondary credentials through oversupply" (NPRM, 43617), we maintain income during the residency training period is not an appropriate measure.

Thank you for providing the opportunity to share our views. AACOM and the AAMC look forward to working closely with the Department to ensure medical students and schools are well served by Title IV student financial aid programs. If you have questions or require further information, please contact Pamela Murphy at 301-968-4151 or pmurphy@aacom.org; or Matthew Shick at 202-862-6116 or mshick@aamc.org.

Sincerely,

Pamela Murphy, M.S.W.
Director of Government Relations
AACOM

Atul Grover, M.D., Ph.D.
Chief Public Policy Officer
AAMC