

September 3, 2021

The Honorable Miguel Cardona
Secretary of Education
US Department of Education
400 Maryland Ave, SW
Washington, DC 20202

Re: Request for Information Regarding the Public Service Loan Forgiveness Program,
Docket ID ED-2021-OUS-0082-0001

Dear Secretary Cardona,

On behalf of the American Association of Colleges of Osteopathic Medicine (AACOM), thank you for the opportunity to provide comments on the US Department of Education's administration of the Public Service Loan Forgiveness (PSLF) Program.

AACOM leads and advocates for the full continuum of osteopathic medical education to improve the health of the public. Founded in 1898 to support and assist the nation's osteopathic medical schools, AACOM represents all 37 colleges of osteopathic medicine—**educating nearly 34,000 future physicians, 25 percent of all US medical students**—at 58 teaching locations in 33 US states, as well as osteopathic graduate medical education professionals and trainees at US medical centers, hospitals, clinics, and health systems.

AACOM urges the Department to take steps to remove the barriers that prevent many public servants, including osteopathic physicians, from obtaining student loan forgiveness under the Public Service Loan Forgiveness (PSLF) and the Temporary Expanded PSLF (TEPSLF) program. We encourage the Department to improve the integrity of PSLF and the operational implementation of the program to be consistent with Congress' intent to establish PSLF as a broad-based program for service and loan forgiveness.

The nation faces a physician workforce shortage, and federal policies must support the educational pathway of the future healthcare workforce. This is particularly critical as it relates to policies that would improve access to healthcare in rural and medically underserved areas where shortages are dire and expected to worsen without effective solutions. Though 18 percent of the U.S. population [live](#) in rural areas, only 11 percent of physicians practice in rural areas. Recent AACOM [data](#) show that 40 percent of graduating 2019-2020 osteopathic medical students plan to practice in a medically underserved or health shortage area; of those, 45 percent plan to practice in a rural community.

The PSLF Program has encouraged physicians and other healthcare professionals to work in full-time public service positions in exchange for partial forgiveness after ten years of consecutive payments. The program has been critical in recruiting physicians, especially in medically underserved areas. Non-profit hospitals and underserved areas have been employing the PSLF Program as a competitive recruiting tool to encourage physicians to practice in these communities.

Moreover, many osteopathic medical students actively pursue careers in primary care, strengthening the backbone of our nation's healthcare system. In 2021, [55 percent](#) of osteopathic seniors entered primary care specialties, and there has been a 116 percent increase of osteopathic graduates entering primary care since 2017. Osteopathic medical school graduates with high debt are [more likely](#) to choose primary care over other specialties while using loan forgiveness programs such as PSLF. In the 2019 – 2020 academic year, [80 percent](#) of graduating osteopathic medical students who reported entering a loan forgiveness program planned on entering the PSLF Program. It is critical to preserve this program for osteopathic physicians and future borrowers.

AACOM urges the Department to adopt the following proposals to increase eligibility and transparency and allow the PSLF Program to serve as an effective health care workforce recruitment tool.

- Allow PSLF eligibility for borrowers working as health care practitioners at public or nonprofit hospitals or health care facilities, but who are prohibited by state law from being employed directly by the hospital or health care facility.
- Publish a registry of certified public service organizations.
- Streamline electronic processes for borrowers.
- Eliminate the provision that requires an otherwise eligible borrower to be employed in public service at the time of forgiveness.
- Allow borrowers to consolidate their loans without losing credit for payments made prior to consolidation while they were working in public service jobs.
- Ensure that borrowers placed into a non-qualifying repayment plan but who meet all other PSLF requirements have their payments counted as qualifying payments for PSLF purposes.
- Provide transparency to borrowers around employment certification denials.
- Establish a fair, consistent, and transparent appeals process when it is determined that the borrower does not meet the eligibility requirements.
- Ensure that for any individuals employed full time in public service before the coronavirus emergency, student loan payments that are deferred as a result of the public health emergency still count towards PSLF, even if the employees lose their job during the "public health emergency."

Thank you for providing the opportunity to share our views. We look forward to working with the Department to strengthen the PSLF Program. If you have any questions or require further information, please contact David Bergman, JD, Vice President of Government Relations, at (301) 968-4174 or dbergman@aacom.org.

Respectfully,



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President and CEO