February 4, 2022

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

The Honorable Richard Burr
Ranking Member
Committee on Health, Education, Labor and Pensions
U.S. Senate
Washington, D.C. 20510

Dear Chair Murray and Ranking Member Burr:

On behalf of the American Association of Colleges of Osteopathic Medicine (AACOM), thank you for the opportunity to provide comments in response to the bipartisan PREVENT Pandemics Act Discussion Draft that seeks to build a stronger public health and medical preparedness and response system. As you develop these proposals, AACOM encourages you to continue obtaining input from the osteopathic medical education (OME) community.

Osteopathic medicine plays an essential role in the fabric of our healthcare system and training the future physician workforce. 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 38 accredited colleges of osteopathic medicine—educating nearly 34,000 future physicians, 25 percent of all U.S. medical students—at 59 teaching locations in 34 U.S. states, as well as osteopathic graduate medical education professionals and trainees at U.S. medical centers, hospitals clinics and health systems.

Osteopathic medicine is the fastest growing medical field in the United States according to the U.S. Bureau of Health Professions. In fact, there has been an 80% increase in the number of osteopathic physicians (DOs) over the past decade. Currently, there are more than 168,000 DOs and osteopathic medical students in this country, and more than 7,000 new osteopathic physicians entered the workforce in 2021. As both the U.S. population and physician workforce continues to age, the need for a robust, well-trained physician workforce is more important than ever. AACOM is proud to represent the OME community and the next generation of our nation’s physician workforce.

AACOM appreciates your leadership and providing us an opportunity to comment on the Discussion Draft.

Title II—Improving Public Health Preparedness and Response Capacity
Subtitle C—Revitalizing the Public Health Workforce
1. Authorizing Health Professions Student Vaccinators
AACOM respectfully requests the addition of language authorizing health professions students to serve as vaccinators to ensure an adequate supply of qualified vaccinators in times of a public health emergency.

The Committee should add language to Title II, Subtitle C amending Section 319F–3(i)(8) of the Public Health Service Act to include the following health professions students, when certified as appropriately trained by their school or training program, to those authorized to assist in vaccination efforts with supervision during federally-declared public health emergencies.

- medical, nursing, pharmacy, pharmacy intern, midwife, paramedic, advanced or intermediate emergency medical technician, physician assistant, respiratory therapy, dental, podiatry, optometry or veterinary students

Public Health Relevance
- Recognizing that an insufficient workforce hindered the pace of the initial COVID-19 vaccination rollout, an AACOM-led interprofessional initiative of 12 associations advocated for more than one million qualified health professions students, including osteopathic and allopathic medical students, to deliver vaccines.
- In March 2021, the Secretary of the Department of Health and Human Services issued the seventh amendment to the Public Health Readiness and Emergency Preparedness (PREP) Act declaration that allows qualified health professions students to administer COVID-19 vaccinations with supervision.
- The current authority will end with the expiration of the COVID-19 public health emergency and legislation is required to codify this authority for future pandemics.

2. Sec 221. Improving Recruitment and Retention of the Frontline Public Health Workforce
AACOM thanks the committee for your attention to the importance of growing and maintaining the public health workforce. The COVID-19 pandemic has demonstrated that a robust physician workforce is essential to meet our nation’s growing healthcare needs, especially in rural and underserved areas. AACOM requests the GAO report include DOs in its study on the public health workforce.

Public Health Relevance
- More than fifty five percent of DOs practice in primary care (including family medicine, internal medicine, and pediatrics).
- Recent AACOM data show that 41 percent of graduating 2020-2021 osteopathic medical students plan to practice in a medically underserved or health shortage area; of those, 49 percent plan to practice in a rural community.

Further, AACOM thanks the committee for expanding student loan repayment in exchange for working in a State, Territorial, Tribal, or local public health department and asks that the program explicitly references DOs as eligible for participation.

3. Sec 223. Improving Public Health Emergency Response Capacity
Osteopathic medicine plays an essential role in our nation’s healthcare delivery system and represents a whole-person, patient-centered approach to the practice of medicine. AACOM
requests that the Secretary of Health and Human Services ensures that DOs are represented on any group that the Secretary appoints to respond to a public health emergency.

Title I—Strengthening Federal and State Preparedness
Subtitle A—Federal Leadership and Accountability

Sec. 101. Comprehensive Review of the COVID–19 Response
The osteopathic community is on the front lines of the battle against COVID-19 and is a critical provider of care during times of public health crisis and emergency. AACOM urges appointment of a DO to the “National Task Force on the Response of the United States to the COVID-19 Pandemic”.

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.

Sincerely,

David Bergman, JD
Vice President of Government Relations