



AMERICAN ASSOCIATION OF
COLLEGES OF OSTEOPATHIC MEDICINE

OFFICE OF THE PRESIDENT

June 29, 2017

The Honorable David J. Shulkin, MD
Secretary of Veterans Affairs
Office of the Secretary
U.S. Department of Veterans Affairs
810 Vermont Avenue, NW
Room 100
Washington, DC 20420

VIA ELECTRONIC MAIL – David.Shulkin@va.gov

Re: Response to March 2017 Letter to Academic Affiliates

Dear Secretary Shulkin:

On behalf of the American Association of Colleges of Osteopathic Medicine (AACOM), thank you for the opportunity to provide feedback on the osteopathic medical education (OME) community's level of engagement and ways to improve academic partnerships with the U.S. Department of Veterans Affairs (VA). I want to reiterate AACOM's strong support for the continued efforts of the VA to preserve and enhance these partnerships, as well as to expand and sustain the graduate medical education (GME) positions as authorized by the *Veterans Access, Choice, and Accountability Act of 2014* (VACAA). These partnerships, both at the undergraduate medical education and GME levels, are critical to ensure the availability of a future physician workforce that is comprehensively trained to provide high-quality health care and meet the needs of the nation's veteran patient populations.

AACOM represents the 33 accredited colleges of osteopathic medicine in the United States. These colleges are accredited to deliver instruction at 48 teaching locations in 31 states. In the 2016-2017 academic year, osteopathic medical colleges are educating more than 27,000 future physicians—more than 20 percent of all U.S. medical students.

OME plays a key role in training the future physician workforce, particularly the primary care workforce. Moreover, it has a long history of establishing educational programs for medical students and residents that target the health care needs of rural and underserved populations. Colleges of osteopathic medicine (COMs) — many of which are located in rural areas — have a standing commitment to and focus on training primary care physicians, which mirrors the special commitment osteopathic physicians have in providing primary care, particularly to the nation's rural and underserved populations. AACOM strongly believes this commitment is aligned with the priorities outlined in VACAA, and the OME community is uniquely positioned to join forces with the VA to support the continued advancement and implementation of the GME expansion initiative.

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AACOM has confirmed that 29 of the nation's 33 osteopathic medical schools have academic affiliation agreements with the VA. These partnerships are critical to ensuring osteopathic medical students and residents are equipped with the training necessary to understand and treat the unique needs of our nation's veteran populations, regardless of whether the trainee becomes a provider in the VA health system. Additionally, AACOM believes clinical experiences at the VA are among the best examples of team-based care. We remain dedicated to serving as a liaison between the VA and the OME community to help facilitate the process to increase and enhance osteopathic affiliations.

The enclosed assessment of OME and academic affiliations with the VA outlines responses received from AACOM's 2017 OME & VA Academic Affiliations Survey, feedback from AACOM's OME & VA Task Force, and other strategic outreach. The OME community reported challenges such as contracting timelines, limitation of support per resident FTE to time spent at VA facilities, and credentialing and privileging process for shared and volunteer faculty. Furthermore, AACOM found OME partners frequently encounter issues connecting with appropriate VA personnel, which has often led to a breakdown in communication, preventing these partnerships from moving forward. To that end, AACOM's outreach underscored the importance of a "local" VA advocate, an employee of the VA facility where an institution is seeking to establish an affiliation. This advocate is essential to help guide OME partners through the affiliation process and ensure appropriate administrative requirements are met.

Thank you again for the opportunity to offer input about ways to enhance academic partnerships with the VA. AACOM looks forward to partnering with the VA as it continues to implement policies and programs to strengthen academic partnerships to build a health care system that enables current osteopathic medical students and future osteopathic physicians to provide the necessary care to meet the needs of our nation's veterans and beyond.

On behalf of the OME community, AACOM stands ready to serve as a resource and provide additional information and consultation that would benefit the VA moving forward. Please feel free to reach out to me at sshannon@aacom.org, or Pamela Murphy, AACOM Senior Vice President of Government Relations at pmurphy@aacom.org, if you have any questions or need further information.

Respectfully,

A handwritten signature in black ink, appearing to read "SC Shannon". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Stephen C. Shannon, DO, MPH
President and CEO

Enclosures

**2017 Assessment of Osteopathic Medical Education and Academic Affiliations with the U.S.
Department of Veterans Affairs**

June 29, 2017

Background

The U.S. Department of Veterans Affairs' (VA) [Office of Academic Affiliations \(OAA\)](#) has partnered with medical schools, residency programs, and institutions in academic affiliations for over 70 years. These partnerships have resulted in academic affiliation agreements with most of the colleges of osteopathic medicine (COMs) and several osteopathic graduate medical education (GME) partners.

The American Association of Colleges of Osteopathic Medicine (AACOM) strongly supports the expansion and sustainability of GME positions created by the *Veterans Access, Choice, and Accountability Act of 2014* (VACAA), which authorized the VA to establish 1,500 medical residency positions over five years beginning with the 2015-2016 academic year. In 2016, this provision of the law was extended, allowing 10 years (through 2024) for the VA to establish these residency positions.

AACOM works closely with the OAA to [inform and engage](#) the osteopathic medical education (OME) community about opportunities to partner with the VA on clinical training programs for osteopathic medical students as well as to increase the number of osteopathic GME positions awarded through VACAA. To further support this effort, in 2016, AACOM established its OME & VA Academic Affiliations Task Force, comprised of individuals who currently oversee affiliation agreements between the COMs and the VA, are involved in establishing or managing relationships with the VA through an Osteopathic Postdoctoral Training Institution (OPTI), or are deans, clinical directors, program directors, and/or directors of medical education at the COMs. The Task Force serves as a liaison between the OME community and the VA and works to develop recommendations on ways to build, strengthen, and expand academic partnerships with the VA.

AACOM's 2017 OME & VA Academic Affiliations Survey

In May 2017, AACOM conducted a survey to assess the OME community's level of engagement and needs as it relates to academic partnerships with the VA. In addition, per a March 2017 [letter](#), VA Secretary David Shulkin contacted AACOM as a VA academic partner to solicit ideas about ways to improve academic partnerships and how to address barriers and policies that often create challenges for these partnerships.

The information collected is intended to inform AACOM as it continues to advance and support academic affiliations between the VA and OME community. Responses were also used to inform AACOM's response to Secretary Shulkin.

Methodology

The survey was jointly prepared and administered by the AACOM Office of Medical Education and Research and the Office of Government Relations. Half of the osteopathic medical schools

responded, with additional responses received from members of OPTIs, members of the Association of Osteopathic Directors and Medical Educators, members of ACGME-accredited sponsoring institutions, and directors of residency specialty programs. The survey included a referral process to ensure accurate responses were obtained from the primary contact overseeing VA academic affiliations, as well as to prevent duplicate responses from the same organization or institution.

Survey Key Findings

- Nearly 60 percent of respondents were from representatives from the COMs. Other respondents were representatives of OPTIs, ACGME-accredited sponsoring institutions, and a residency specialty program.
- While more than 90 percent of respondents expressed interest in expanding GME positions with the VA, approximately 80 percent indicated interest in expanding medical student clinical rotation experiences during the third and fourth years of medical school. Respondents were also seeking opportunities to expand fellowship positions and collaborate on faculty sharing with the VA.
- Of the respondents, about 70 percent are not currently affiliated with a VACAA GME program. However, more than 75 percent of respondents would like to be contacted directly by the VA to explore adding VACAA GME positions. AACOM will serve as a liaison between the OME community and the VA to help facilitate this process.
- All respondents believe that the VA would benefit from looking at outcomes from historic academic medical center training programs/relationships compared to smaller/newer community-based (often-osteopathic) programs.
- Based on Secretary Shulkin's request for information, respondents indicated that the following areas are the most challenging when developing academic affiliation relationships with the VA:
 - Contracting timelines;
 - Lack of incentives for teaching for VA employees;
 - Limitation of support per-resident FTE to time spent at VA facilities;
 - Sole source contracting processes; and
 - Credentialing and privileging process for shared and volunteer faculty.

Feedback Received from AACOM's OME & VA Task Force and Strategic Outreach

AACOM has confirmed that of the nation's 33 osteopathic medical schools, 29 of the COMs have academic affiliation agreements with the VA. AACOM will continue to serve as a liaison to increase this number and ensure the COMs connect with appropriate VA staff to establish these partnerships. According to AACOM's strategic outreach and Task Force discussions, the following highlights areas of opportunity to improve and enhance academic partnerships with the VA.

- Improve communication and coordination: OME partners frequently experience challenges connecting with appropriate VA personnel to initiate academic partnerships. This has often led to a breakdown of communication and might prevent the partnership from initially forming.
- Designate a "local" VA advocate: An advocate within the VA system, someone who is employed by the VA facility where an institution is seeking to establish an affiliation and who can provide on-the-ground support, is critical to ensure rotations are available and is needed to help guide

OME partners through the process to complete the necessary administrative and documentation requirements.

- Increase education on VA opportunities: More specifics are needed on the undergraduate medical education opportunities available at the VA. Additionally, increased promotion is needed of the VACAA GME expansion initiative. AACOM is willing and ready to serve as a liaison to facilitate this process.
- Streamline the affiliation agreement process: AACOM recognizes the need for proper oversight and approval of academic affiliation agreements; however, the VA should work to streamline this process to help eliminate lengthy timelines and improve coordination with its affiliates.
- VA as a sponsoring institution: The VA should explore developing and sponsoring GME programs and have a mechanism in place whereby COM faculty are appropriately credentialed to supervise and/or engage in clinical care at a VA facility.
- Partial continuity clinic: There is often confusion about whether a partial continuity clinic is permissible to meet accreditation requirements. Further education by the VA is needed to clarify this issue. It is recommended that the VA formalize its policy and provide official language to address any misunderstanding between the local and national levels.
- Partnering with community-based sites: Although AACOM has received feedback that the VA is eager to partner with community-based sites, there is an information gap on how to create partnerships that will meet accreditation requirements.
- COM Faculty Needs at the VA: The COMs often face challenges when clinical faculty appointments are split across multiple VA facilities. The VA should explore ways to address this issue while meeting VA requirements in providing specialty care at multiple VA locations.

About AACOM

[AACOM](#) represents the 33 accredited colleges of osteopathic medicine in the United States. These colleges are accredited to deliver instruction at 48 teaching locations in 31 states. In the 2016-17 academic year, these colleges are educating more than 27,000 future physicians—more than 20 percent of all U.S. medical students. Six of the colleges are public and 27 are private institutions.

AACOM was founded in 1898 to support and assist the nation's osteopathic medical schools, and to serve as a unifying voice for osteopathic medical education. AACOM provides leadership for the osteopathic medical education community by promoting excellence in medical education, research and service, and by fostering innovation and quality across the continuum of osteopathic medical education to improve the health of the American public.

Contact Information:

Please contact VA_GME@aacom.org if you have any questions about this assessment or the survey.