



Addressing Regulatory Burdens Impacting Osteopathic Medical Schools

AACOM calls on Congress to address burdensome regulatory barriers that negatively impact osteopathic medical schools and the students they serve during the reauthorization of the *Higher Education Act*. We strongly urge Congress to implement successful solutions and provide flexibility to ensure osteopathic medical schools and their students are well-served by the U.S. Department of Education (USDE)'s Title IV federal financial aid programs.

State Authorization

AACOM supports a thorough evaluation of the unintended consequences of the state authorization regulation on medical education, and the revision of the USDE regulatory policy accordingly to reflect the unique circumstances of medical education.

The state authorization provisions in the 2010 USDE program integrity regulations have created costly and untenable burdens for medical schools to maintain eligibility to offer federal financial aid. The state authorization regulations consist of a physical presence requirement, which took effect in July 2015, and distance education policies.

To comply with the state authorization physical presence requirement, when sending students to out-of-state clinical rotations, osteopathic medical schools are being charged high fees and forced to meet numerous administrative mandates to operate in those states and maintain Title IV eligibility. These new fees for out-of-state clinical placements have had a particularly damaging impact on postsecondary institutions educating medical students, since clinical experience is a core requirement. Often, these students are completing clinical rotation requirements in medically rural and/or underserved areas.

If the distance education requirement is implemented in its current form, AACOM member institutions will again face an extremely heavy lift, compounding the harmful impacts of the existing state authorization regulations. AACOM urges Congress to address this regulation in a comprehensive manner and require consistency during implementation to help streamline an already complex regulatory process.

Gainful Employment

AACOM supports re-examining the gainful employment regulation with consideration of the factors unique to medical education.

The gainful employment regulation in the USDE's 2010 program integrity regulations took effect in July 2015. Intended to promote principles of accountability in the Title IV federal student financial aid programs among institutions of higher education, the regulation requires career education programs to prepare students for gainful employment in a recognized occupation, or risk losing access to Title IV funding.



This sweeping regulation specifically targets for-profit institutions, including highly qualified U.S. for-profit osteopathic medical schools, and completely disregards factors unique to medical education. After graduation, medical residents receive a small stipend while they complete years of postgraduate training prior to independent practice. This income is not sufficient to begin full repayment of educational loans and is certainly not indicative of the future practicing physician's salary. AACOM calls on policymakers to re-examine these one-size-fits-all regulations to account for the unique nature of providing and earning a medical education.

For further information, please contact info@edtomed.com.