



Address Regulatory Burdens Impacting Osteopathic Medical Schools

As Congress works to reauthorize the *Higher Education Act*, AACOM strongly supports addressing burdensome regulatory barriers which have a negative impact on osteopathic medical schools. We strongly encourage Congress to implement successful solutions to ensure osteopathic medical institutions and their students are well-served by the U.S. Department of Education's (USDE) Title IV federal financial aid programs.

State Authorization

AACOM supports creating consistency among the states during their implementation of the state authorization regulation.

The state authorization provisions in the 2010 USDE program integrity regulations, which became effective in July 2015, have created a serious burden for medical schools. In order to comply with state authorization requirements, when sending students to out-of-state clinical rotations, osteopathic medical schools are being charged high fees and forced to meet numerous administrative mandates in order to operate in those states. These new fees for out-of-state clinical placements have had a particularly damaging impact on postsecondary institutions educating medical students, as clinical experience is a core requirement.

In addition, since state policies vary widely, there is no consistency with the implementation of these provisions amongst states. Due to the unintended consequences of these regulations, medical schools continue to face numerous challenges; therefore, AACOM urges Congress to address this regulation in a comprehensive manner and require consistency during implementation.

Gainful Employment

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

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

This sweeping regulation specifically targets for-profit institutions, to include 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 post-graduate 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 urges the re-examination of these one-size-fits-all regulations to take into account the unique nature of providing and earning a medical education.

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