



July 14, 2023

The Honorable Miguel Cardona
Secretary
U.S. Department of Education
400 Maryland Avenue, SW, Room 7E307
Washington, D.C. 20202

Re: Docket ID ED-2023-OPE-0123; Intent to establish a negotiated rulemaking committee

Dear Secretary Cardona:

On behalf of the American Academy of Family Physicians (AAFP), representing 129,600 family physicians and medical students across the country, I write in response to the [notice](#) that the Department of Education (the Department) intends to establish a negotiated rulemaking committee to prepare proposed regulations for federal student aid programs.

The AAFP applauds the Department's commitment to providing debt relief to borrowers and strongly supports the initiation of a new rulemaking process. When examining student loan debt by educational attainment, physicians are the most likely to have student loan debt with 81 percent of those with Doctor of Medicine degrees having graduate school debt and 80 percent owing for undergraduate education.¹ The high burden of medical education debt contributes to worsening physician shortages and puts medical education out of reach for many potential physicians, further undermining progress toward a diverse health care workforce. Given that these challenges undermine progress toward better patient and population health outcomes, **addressing the burden of student loan debt for physicians and medical students is one essential step to improving our nation's health care system. The AAFP strongly urges the Department to include a family physician in the negotiated rulemaking process and advance policies to provide meaningful debt relief for physicians across the nation.**

The AAFP has long been concerned about the shortage of primary care physicians in the U.S., particularly the supply of family physicians, who provide comprehensive, longitudinal primary care services for patients across the lifespan, including chronic disease management, treatment of acute illnesses, and preventive care. It is projected that we will face a shortage of up to 48,000 primary care physicians by 2034.² Primary care is the only health care component where an increased supply is associated with better population health and more equitable outcomes.³

The average student loan debt for four years of medical school, undergraduate studies and higher education is on average between \$200,000 and \$250,000.⁴ This number will only continue to increase as the cost of medical school continues to rise. In fact, for first-year students in 2020-21, the average cost of attendance increased from the prior year for public medical schools by 10.3 percent, making it likely that medical students will have to carry even larger student loans to graduate.⁵

Physicians will incur the same cost for their medical education whether they enter primary care or specialist fields, but once they complete their training, they will have more difficulty managing their

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debt in primary care fields due to lower income. For example, when measuring debt as a ratio to income, primary care physicians have approximately double the debt burden as those entering surgical fields.⁶ Research has also shown that loan forgiveness or repayment programs directly influence physician's choices about whether to choose primary care specialties.⁷

The AAFP recognizes the Department has taken several steps to provide relief to borrowers amid the pandemic and to advance more affordable repayment policies. The pause on student loan repayment, interest, and collections instituted in response to the COVID-19 pandemic has provided much needed short-term relief, which has been particularly helpful as family physicians have been financially strained by disruptions to their practice. **We thank the Department for its efforts to reduce the burden of student loan debt, including a recent announcement to protect borrowers when repayments begin this fall.**

The AAFP urges the Department to use its authority to advance policies that provide meaningful debt relief to physician borrowers. As previously noted, addressing medical education debt can help alleviate physician shortages and improve equitable access to high-quality care for patients. Student loan debt can prevent students from diverse backgrounds from going to medical school, as well as prevent physicians from choosing primary care over other specialties and joining or opening practices in rural and other underserved communities. **Providing debt relief to physicians and medical students would therefore advance several goals that are in-line with the President's national strategies and executive orders to [advance equity](#), [address our nation's mental health crisis](#), and [invest in rural communities](#).**

Including a family physician negotiator on the committee being formed by the Department is an essential first step. This will help ensure the unique circumstances experienced by physicians across the nation are considered during the upcoming rulemaking process.

The AAFP recognizes that a long-term solution is needed to comprehensively address the student debt issue and has called on Congress to take action. To combat rising student debt, the AAFP has [called](#) for expanded funding for federal loan forgiveness and scholarship programs that target family medicine and primary care. The Academy also [supports](#) the deferment of interest and principal payments on medical student loans until after completion of postgraduate training and recommends that the interest on medical student loans be deductible on federal tax returns. While we will continue to work with Congress on comprehensive solutions, we urge the Department to take action.

Thank you for the opportunity to provide comments ahead of the upcoming public hearing. The AAFP stands ready to work with the Department of Education to advance student debt relief policies that will help bolster and diversify our health care workforce and advance equitable access to high-quality primary care for all. For more information or questions, please contact Meredith Yinger, Senior Manager of Federal Policy at myinger@aaafp.org or (202) 235-5126.

Sincerely,



Sterling N. Ransone, Jr., MD, FFAFP
Board Chair, American Academy of Family Physicians

¹ Hanson, M. "Student Loan Debt Statistics" EducationData.org, June 29, 2023, <https://educationdata.org/student-loan-debt-statistics>

² IHS Markit Ltd. The Complexities of Physician Supply and Demand: Projections From 2019 to 2034. Washington, DC: AAMC; 2021.

³ National Academies of Sciences, Engineering, and Medicine. 2021. Implementing High-Quality Primary Care: Rebuilding the Foundation of Health Care. Washington, DC: The National Academies Press. <https://doi.org/10.17226/25983>.

⁴ Hanson, M. (2021, July 25). Average medical school debt. EducationData.org. Retrieved October 12, 2021, from <https://educationdata.org/average-medical-school-debt>.

⁵ AAMC. (2022, March). *Tuition and student fees reports*. AAMC. Retrieved August 2, 2022, from <https://www.aamc.org/data-reports/reporting-tools/report/tuition-and-student-fees-reports>

⁶ Friedman AB, Grischkan JA, Dorsey ER, George BP. Forgiven but not Relieved: US Physician Workforce Consequences of Changes to Public Service Loan Forgiveness. *J Gen Intern Med*. 2016 Oct;31(10):1237-41. doi: 10.1007/s11606-016-3767-2. Epub 2016 Jun 13. PMID: 27295187; PMCID: PMC5023611.

⁷ Scheckel CJ, Richards J, Newman JR, Kunz M, Fangman B, Mi L, Poole KG Jr. Role of Debt and Loan Forgiveness/Repayment Programs in Osteopathic Medical Graduates' Plans to Enter Primary Care. *J Am Osteopath Assoc*. 2019 Apr 1;119(4):227-235. doi: 10.7556/jaoa.2019.038. PMID: 30907961.