



April 27, 2006

Elizabeth M. Duke, Ph.D.
Administrator
Health Resources and Services Administration
U.S. Department of Health and Human Services
5600 Fishers Lane
Rockville, MD 20857

**Association of
American Medical Colleges**
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Jordan J. Cohen, M.D.
President

Dear Dr. Duke:

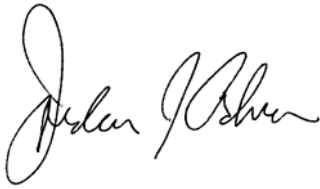
I write on behalf of the Association of American Medical Colleges (AAMC) to recommend that the eligibility requirements for all Department of Health and Human Services (HHS) loan programs be amended to allow for the waiver of parental financial information in extraordinary circumstances. The AAMC represents the nation's 125 accredited allopathic medical schools, 400 major teaching hospitals and health systems, and more than 67,000 medical students through 94 academic and scientific societies.

Currently, the HHS Student Financial Aid Guidelines (section 101.3.142) indicate that "institutions still must take parents' information" into account to determine students' eligibility for the Primary Care Loan (PCL), Health Professions Student Loan (HPSL), Loan for Disadvantaged Students (LDS), and Nursing Student Loan (NSL) programs. In other federal financial aid programs — for instance, under the auspices of the Department of Education — financial aid officers have the ability to adjust this parental financial information requirement to reflect an individual's specific situation; however, HHS regulations state that the requirement to include parental data "cannot be waived."

There are compelling instances in which it would be appropriate for financial aid officers to use professional judgment to waive parental data for one or both parents, such as when a parent is incarcerated or incapacitated during long-term hospital care, or when a parent's whereabouts are unknown. Permitting financial aid officers to use their professional judgment to waive this requirement in appropriate cases would afford them greater flexibility in ensuring that scarce resources are best targeted to those students who are truly in need. Furthermore, the AAMC believes this is a more appropriate interpretation of the federal regulations that require the consideration of the "expected contribution from parents" (42 CFR Part 57.206).

As the administrators of these loans, financial aid officers have first-hand knowledge of the operation of these programs and of the students who participate in them. Considering this familiarity and expertise, financial aid officers' professional discretion is the best tool to evaluate a student's financial situation. We appreciate the Health Resources and Services Administration's work to administer the PCL, HPSL, LDS, and NSL programs and hope you will find our recommendation in the best interest of the programs and students they benefit. Should you have any questions, please do not hesitate to contact Matthew Shick <mshick@aamc.org> at 202-828-0525.

Sincerely,

A handwritten signature in black ink, appearing to read "Jordan J. Cohen". The signature is fluid and cursive, with a large initial "J" and "C".

Jordan J. Cohen, M.D.

Cc: Kerry P. Nessler, R.N., M.S.
Henry Lopez, Jr.