



May 17, 2024

**Association of
American Medical Colleges**
655 K Street, NW, Suite 100, Washington, DC 20001-2399
T 202 828 0400
aamc.org

The Honorable Miguel Cardona
Secretary of Education
U.S. Department of Education 400
Maryland Ave SW
Washington, DC 20202

Re: Student Debt Relief for the William D. Ford Federal Direct Loan Program, the Federal Family Education Loan Program, the Federal Perkins Loan Program, and the Health Education Assistance Loan Program, Docket ID ED-2023-OPE-0123

Dear Secretary Cardona:

The Association of American Medical Colleges (AAMC) appreciates the opportunity to comment in support of proposed regulations to provide for the waiver of student loan debts as outlined in Department of Education (ED) proposed rule (FR 2024-07726). We applaud targeted debt relief efforts that would support medical student borrowers engaged in repayment under the federal student loan programs.

The AAMC is a nonprofit association dedicated to transforming health through medical education, health care, medical research, and community collaborations. Its members are all 158 U.S. medical schools accredited by the Liaison Committee on Medical Education; approximately 400 academic health systems and teaching hospitals, including Department of Veterans Affairs medical centers; and more than 70 academic societies. Through these institutions and organizations, the AAMC leads and serves America's medical schools, academic health systems and teaching hospitals, and the millions of individuals across academic medicine, including more than 193,000 full-time faculty members, 96,000 medical students, 153,000 resident physicians, and 60,000 graduate students and postdoctoral researchers in the biomedical sciences. Following a 2022 merger, the Alliance of Academic Health Centers and the Alliance of Academic Health Centers International broadened participation in the AAMC by U.S. and international academic health centers.

The AAMC recognizes the importance of access to Title IV student aid funding as a critical means to support the nation's physician workforce. The availability of key federal borrower benefits and protections, including repayment assistance through the federal income-driven repayment (IDR) plans enables physician borrowers to responsibly repay their loans. Accumulating student loan interest can add thousands to a borrower's balance. Implementation of the Saving on a Valuable Education plan has been a welcome relief for borrowers, ensuring that interest does not grow beyond their monthly payment amount. We are grateful that the proposed rule would help curtail the effects of interest accumulation on loan balances and bolster relief for those currently repaying loans under the IDR plans (§ 30.81).

We also appreciate that the proposed rule builds on a number of debt relief prior actions that the Department has taken in recent years to ensure that borrowers obtain the loan forgiveness they are eligible for but may not be receiving due to lack of enrollment in an IDR plan, being in a non-eligible repayment plan, or having loans not federally held, among other provisions. This proposed rule adds to the spirit of those efforts by seeking to forgive the outstanding loan balance for borrowers in these circumstances (§ 30.84 & § 30.85).

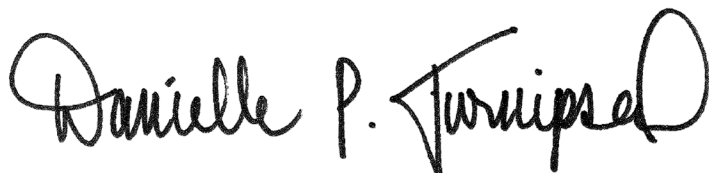
In addition, the proposal to include Health Education Assistance Loans among the types of loans eligible for forgiveness would go a long way toward providing debt relief for borrowers with older loans who have been in repayment for a protracted time (§ 30.70(e)(1)).

We also applaud the inclusion of language to forgive up to \$20,000 in instances in which the borrower's current balance exceeds the balance when entering repayment (§ 30.82). The inclusion of such forgiveness without income caps would ensure targeted debt relief will reach all eligible borrowers currently in repayment, regardless of their financial situation. Efforts to forgive outstanding balances for borrowers who have been in repayment for 25 years or more in pursuit of a degree beyond undergraduate education, will be welcomed by those currently repaying under an extended repayment window (§ 30.83). While we appreciate these steps to provide for targeted forgiveness, we also note that pursuit of a medical degree requires years of rigorous study and highly specialized training, often leading to higher borrowing amounts and greater interest accumulation while in school. In recognition of this, we suggest that the Department consider expanding the proposed language to allow for forgiveness parity across all federal student loan borrowers at 20 years of repayment.

Targeted debt forgiveness can be an effective tool in supplementing the federal IDR plans. Access to affordable repayment options helps to encourage future physicians to serve in high-need areas, an endeavor critical to a strong, diverse healthcare workforce and improved care for all.

The AAMC appreciates your consideration of the above comments. Should you have any questions, please contact our colleagues Kristen Earle (kearle@aamc.org) or Devan O'Toole (dotoole@aamc.org).

Sincerely,

A handwritten signature in black ink that reads "Danielle P. Turnipseed". The signature is written in a cursive, flowing style.

Danielle Turnipseed, JD MHSA MPP
Chief Public Policy Officer
Association of American Medical Colleges

