



January 27, 2022

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

Dear Secretary Cardona:

On behalf of the American College of Physicians (ACP), I am writing to applaud your recent efforts to improve the Public Service Loan Forgiveness (PSLF) program and offer suggestions to further strengthen the program. ACP strongly supports expansion and simplification of the program to help students attend medical school and encourage those young physicians to practice medicine in governmental and nonprofit settings to advance the health and wellbeing of the country.

The American College of Physicians is the largest medical specialty organization and the second largest physician membership society in the United States. ACP members include 161,000 internal medicine physicians (internists), related subspecialists, and medical students. Internal medicine physicians are specialists who apply scientific knowledge and clinical expertise to the diagnosis, treatment, and compassionate care of adults across the spectrum from health to complex illness. Internal medicine specialists treat many of the patients at greatest risk from COVID-19, including the elderly and patients with pre-existing conditions like diabetes, heart disease and asthma.

ACP is greatly concerned by the already high and ever-increasing cost of obtaining a medical education and the impact those expenses have on the number of medical students and residents opting to enter careers in primary care. Estimates say over 86% of medical students graduate with educational debt, and over 40% of medical students who graduate with educational debt report they owe over \$150,000 and some report debt as high as \$350,000¹. ACP feels strongly that the federal government should create incentives for medical students to pursue careers in primary care and practice in areas of the nation with greatest need by developing or expanding programs that eliminate student debt for these individuals—linked to a reasonable service obligation in the field and creating incentives for these physicians to remain in underserved areas after completing their service obligation.

ACP is concerned with the complexity and confusion surrounding the PSLF program that was designed to encourage individuals to enter lower-paying but essential public sector jobs,

¹ Medical Student Debt. AMSA. <https://www.amsa.org/action-committee/wellness-student-life-action-committee/medical-student-debt/>. Accessed January 20, 2022.

including in medicine and public health. These issues resulted in a high percentage of PSLF applications being outright denied and an astonishingly low number of having their loans forgiven after the required 120 payments. Loan forgiveness is an important incentive to encourage future physicians to choose career paths in public service and nonprofits that help serve the overall public health, especially in primary care and underserved areas. It is also an important recruitment tool for government and nonprofit entities.

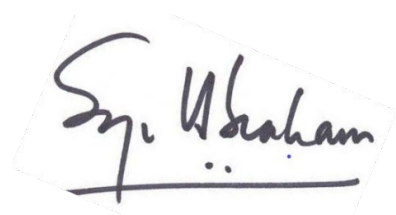
ACP applauds recent efforts to make improvements to the PSLF program, such as including a limited waiver to count all prior payments made by student borrowers toward the PSLF program, regardless of their federal loan program or repayment plan; simplifying the PSLF application process; and improving outreach and communication efforts with PSLF-eligible borrowers².

ACP has several recommendations to continue strengthening the program as the Department considers operational improvements to PSLF:

- Expand eligibility to all physicians practicing at government or nonprofit healthcare settings,
- Ensure borrowers who have indicated interest in the PSLF program will be eligible for loan forgiveness regardless of future changes to the program or eligibility,
- Allow all federal repayment plans to qualify for the program,
- Ensure COVID-19–based non-payment months due to the administrative forbearance period are appropriately included towards an individual’s progress in the PSLF, and
- Instruct and certify all loan servicers assist and educate potential PSLF borrowers to reduce confusion and miscommunication.

We thank you for the amendments made to the program and appreciate the opportunity to give recommendations for further improvements that would alleviate medical education debt and help support a physician workforce that adequately meets the nation’s healthcare needs.

Sincerely,

A handwritten signature in dark ink, reading "G. M. Abraham", with a horizontal line underneath the name.

George M. Abraham, MD, MPH, MACP, FIDSA
President

² Roude B, Earle K. Department of Education announces improvements to the PSLF program. AAMC. <https://www.aamc.org/advocacy-policy/washington-highlights/departments-education-announces-improvements-pslf-program>. Published October 8, 2021. Accessed January 20, 2022.