



August 23, 2024

The Honorable Miguel Cardona, PhD  
Secretary of Education  
400 Maryland Avenue, SW  
Washington, D.C. 20202

Via electronic submission at [regulations.gov](https://www.regulations.gov)

Re: Comments on Notice of Proposed Rulemaking, Docket ID ED-2024-OPE-0050

Dear Secretary Cardona:

On behalf of the American Association of Colleges of Osteopathic Medicine (AACOM), I am pleased to submit written comments on the U.S. Department of Education's recent notice of proposed rulemaking on regulations pertaining to distance education, return of Title IV funds, and federal TRIO programs.

AACOM leads and advocates for the full continuum of osteopathic medical education to improve the health of the public. Founded in 1898 to support and assist the nation's osteopathic medical schools, AACOM represents all 41 accredited colleges of osteopathic medicine (COMs)—educating more than 36,500 future physicians, 25 percent of all U.S. medical students—at 66 teaching locations, as well as osteopathic medical education professionals and trainees at U.S. medical centers, hospitals, clinics and health systems.

AACOM supports the Department's goals to better measure student outcomes, improve oversight over distance education, and ensure students are receiving effective education. Concurrently, as the nation faces a physician workforce shortage, we firmly believe that federal policies must also support the educational pathway of the future healthcare workforce.

#### Distance Education

AACOM urges the Department to provide additional clarity to its definition of "distance education course" as it relates to medical education. **Clinical rotations, including those with virtual didactics components, should not be treated as distance education courses.**

Osteopathic medical students typically spend the first two years of their medical education at the institution to receive academic instruction in the medical sciences, obtain a core set of clinical examination skills and train in ethics and professional responsibility. These mandatory two years of lectures, laboratory training and other learning experiences prepare students for core clinical rotations during years three and four.

The Department must be mindful of the unique nature of remote medical instruction during third- and fourth-year clinical rotations. With increasing competition for clinical training opportunities, COMs, many of which are located in rural areas, may lack sufficient local or in-state options and send their students out of state to complete their core clinical rotations. This includes using service regions to train students across a broader geographic area. Some schools also participate in multistate consortium training models to enhance educational experiences and produce physicians capable of practicing in a variety of clinical settings.

During these clinical rotations, students receive in-person instruction from physician preceptors while the course director of record, such as the clinical dean, is often located on campus. These courses may also include virtual didactic components where the student attends online classes based at their home institution. Classifying these clinical rotations as distance education would be a profound disruption to the community-based clinical education model and would limit the number of medical school graduates who have experience training in rural and underserved areas. This would have detrimental effects on the physician workforce pipeline and access to healthcare for these areas.

**AACOM seeks clarifying language to ensure that COMs do not face undue administrative burdens that further complicate distance education requirements.** AACOM recommends that revised regulations explicitly confirm that students enrolled in out-of-state core clinical education rotations are considered to be enrolled at the main campus of their medical institution and are not enrolled in distance education or correspondence courses.

### Conclusion

Thank you for your consideration of our views. AACOM looks forward to working closely with the Department to ensure that medical schools, their students and the communities they serve are not adversely impacted by distance education requirements. If you have



questions or require further information, please contact David Bergman, JD, Senior Vice President of Government Relations and Health Affairs, at [dbergman@aacom.org](mailto:dbergman@aacom.org).

Sincerely,

A handwritten signature in black ink that reads "Robert A. Cain, DO". The signature is written in a cursive, flowing style.

Robert A. Cain, DO, FACOI, FAODME  
President & Chief Executive Officer  
American Association of Colleges of Osteopathic Medicine