



PHYSICIAN ASSISTANT EDUCATION ASSOCIATION

655 K Street NW, Ste. 700, Washington, DC 20001
PAEAonline.org • 703-548-5538

December 11, 2017

The Honorable Virginia Foxx
Chair
Committee on Education and
the Workforce
United States House of Representatives
Washington, D.C. 20515

The Honorable Robert Scott
Ranking Member
Committee on Education and
the Workforce
United States House of Representatives
Washington, D.C. 20515

The Honorable Brett Guthrie
Chair
Subcommittee on Higher Education
and Workforce Development
United States House of Representatives
Washington, D.C. 20515

The Honorable Susan Davis
Ranking Member
Subcommittee on Higher Education
and Workforce Development
United States House of Representatives
Washington, D.C. 20515

Dear Chairwoman Foxx, Chairman Guthrie, and Ranking Members Scott and Davis:

On behalf of the Physician Assistant Education Association (PAEA), we are writing to express both enthusiasm for your efforts to reauthorize the Higher Education Act as well as our concerns regarding certain provisions of the Promoting Real Opportunity, Success, and Prosperity through Education Reform (PROSPER) Act. PAEA represents the 229 accredited PA education programs currently operating in the United States, which collectively graduate more than 8,000 PAs each year. Throughout our history, PAEA has been dedicated to pursuing higher education policy reform with the potential to enable our member programs to prepare the next generation of health care providers to provide high-quality care to patients.

We would like to express our positions on the following provisions of the PROSPER Act:

2017 PAEA BOARD OF DIRECTORS

William Kohlhepp, DHSc, PA-C PRESIDENT
Lisa Mustone Alexander, EdD, MPH, PA-C PRESIDENT ELECT
Jennifer Snyder, PhD, MPAS, PA-C IMMEDIATE PAST PRESIDENT
Howard Straker, MPH, PA-C SECRETARY
Carl Garrubba, MPA, PA-C, CPA TREASURER
Kara Caruthers, MSPAS, PA-C DIRECTOR AT LARGE
Constance Goldgar, MS, PA-C DIRECTOR AT LARGE

Janie McDaniel, MS, MLS(ASCP)SC DIRECTOR AT LARGE
Dipu Patel-Junankar, MPAS, PA-C DIRECTOR AT LARGE
Kevin Schuer, DrPH, PA-C DIRECTOR AT LARGE
Michel Statler, MLA, PA-C DIRECTOR AT LARGE
John Ramos, MMS, PA-C STUDENT MEMBER AT LARGE
Timi Agar Barwick, MPM EX OFFICIO MEMBER



Federal ONE Loan Program

PAEA supports efforts to streamline the federal loan application, disbursement, and repayment processes for PA students while making the federal student aid system more reflective of the current state of higher education. We were particularly pleased to learn that, under the Federal ONE loan program created in the PROSPER Act, the longstanding disparity in borrowing limits between PA students and students of comparable health professions would be eliminated. Under current law, PA students are restricted to lower borrowing limits in the Direct Loan program than their peers in the health professions, often requiring them to rely on less favorable, higher-interest loan options. Specifically, PAs are currently subject to a \$20,500 annual borrowing limit and a \$138,500 aggregate limit, compared to other health professions students, who are eligible for between \$33,000 and \$47,167 annually and \$224,000 in lifetime borrowing.

In addition to the parity in borrowing limits established by the PROSPER Act, we also support the higher annual and aggregate borrowing limits established under the Federal ONE loan program. Increasing annual limits for PA students to either \$41,000 or \$45,167 depending on the length of their academic year, as well as increasing the aggregate borrowing limit to \$235,500, would represent a significant improvement from existing policy and better reflect the true cost of higher education for students.

While we are pleased that PA students will achieve borrowing parity under the Federal ONE Loan Program, we are concerned about the impact of a number of additional provisions related to the consolidation of existing programs. Due to the current parity issue within the Direct Loan program, many of our students have traditionally relied upon the Grad PLUS program to meet their financial commitments while limiting the need for private loans. While we generally support greater simplicity in the federal student aid system, we are concerned that the elimination of the Grad PLUS program may reduce the potential benefits of higher borrowing limits under the Federal ONE program for students with high tuition costs or with significant undergraduate debt.

Consolidated Loan Repayment Options

Although PAEA was pleased to learn that the current parity issue for PA students would be largely resolved through the creation of the Federal ONE loan program, we have significant concerns related to the consolidation of loan repayment options proposed in the PROSPER Act. A specific concern is the elimination of the Public Service Loan Forgiveness program. We



are strongly committed to encouraging our students to work with underserved communities following graduation and have consistently supported the incentives created by PSLF. We urge the committee to protect the program moving forward.

Beyond the scope of the PSLF program, we are also concerned that the consolidation of loan repayment programs into two standard 10-year and income-based repayment options while eliminating long-term loan forgiveness does not adequately reflect the financial capacity of PA graduates to reduce their often high debt burden. Moreover, we believe that this consolidation could serve to further disincentivize graduates from working in primary care or in medically underserved areas and encourage them to pursue more immediately lucrative positions.

Historically Black Colleges and Universities (HBCUs) and Hispanic-Serving Institutions (HSIs)

PAEA is committed to supporting the development of PA programs at Historically Black Colleges and Universities (HBCUs) and Hispanic-Serving Institutions (HSIs), in order to improve the diversity of the PA workforce and ensure the provision of culturally competent care to patients. We are therefore concerned about provisions in the PROSPER Act such as the requirement that HSIs have a 25% graduation rate to qualify for Title V grants. While we support accountability metrics for educational institutions, we believe that this provision represents an unnecessary and ultimately counterproductive barrier to institutional development when federal policy should be focusing on enhancing the capacity of minority-serving institutions to prepare practice-ready graduates for the health care workforce.

State Authorization

PAEA member programs face a shortage of clinical sites, as do many of their peers in health professions education. We are pleased to see the repeal and prohibition of state authorization; however, we seek clarity from the committee that this applies to state laws that require burdensome regulatory registration and payment of fees so that students can complete their clinical education requirements in states outside of their institution's home state. In a time where the nation faces severe provider shortages, elimination of all barriers to clinical training of students is crucial.

Accreditation/Competency-Based Education

We support competency-based education that can be validly and reliably assessed as addressed in Section 496. PA education is interested in accreditation standards allowing for educational flexibility based on the pace at which knowledge is gained during training, rather



than using prior experience or training as a direct pathway to more expeditious movement through the course of study. This will modernize the ability of PA education programs to design programs that develop the competencies of future PAs without the restrictions of needing a certain amount of “seat time” to prove that the competencies have been obtained. Additionally, the competencies listed in section 496(2)(ii)(I-IV) will provide programs with better oversight in how they design instructional delivery in such a way that no curriculum design or method receives preferential treatment by an accrediting body. We believe that this legislative change would further support the ability of our programs to produce PAs that are ready to meet the challenges of a constantly evolving healthcare environment.

We appreciate the opportunity to share the perspective of the PA education community on the PROSPER Act and look forward to working with the committee to ensure that the reauthorization of the Higher Education Act is conducive to the continued development of a high-quality PA workforce. For additional information or should you have questions, please contact PAEA Director of Government Relations Athena Abdullah at aabdullah@PAEAonline.org or (703) 667-4322.

Sincerely,

A handwritten signature in black ink that reads 'William Kohlhepp'.

William Kohlhepp, DHSc, PA-C
President

A handwritten signature in black ink that reads 'Timi Agar Barwick'.

Timi Agar Barwick, MPM
Chief Executive Officer