



PA EDUCATION ASSOCIATION
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June 15, 2023

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

RE: Docket ID ED-2023-OPE-0089: Financial Value Transparency and Gainful Employment (GE), Financial Responsibility, Administrative Capability, Certification Procedures, Ability to Benefit (ATB)

Dear Secretary Cardona:

On behalf of the PA Education Association (PAEA), the national organization representing the 303 accredited PA education programs in the United States, we are writing to offer our comments on the Department's recently proposed regulations pertaining to institutional administrative capability. **Specifically, we would like to express our strong concerns with the Department's proposed requirement related to clinical education and its likely unintended consequences for both health equity and educational affordability.**

For more than 50 years, the PA profession has played a critical role in addressing health workforce shortages in rural and underserved communities. Based in the medical model of health professions education, a typical PA program is approximately 27 months in length

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divided between a didactic, or classroom-based, phase and a clinical phase wherein students complete a series of clinical rotations in different specialties and practice settings to gain patient care experience prior to graduation, national certification, and state licensure. **As a condition of programmatic accreditation, all PA programs are required to facilitate clinical placements for students, thereby ensuring they receive the practical education necessary for professional practice.**

While programs must comply with this existing accreditation requirement, many have reported increasing difficulty in obtaining clinical training sites due to competition with other health professions programs and limited capacity among practicing providers, among other factors. This difficulty has led more than half of PA programs nationwide to pay for clinical rotations at an average cost of \$291 per week per student, thereby ultimately raising the cost of education for students.¹ One strategy that over 60% of PA programs have used to contain these costs is facilitating geographically remote rotations for students, which often has the simultaneous benefit of increasing their likelihood to practice in rural and underserved areas through exposure to these communities during the clinical training phase.¹

In its recently released administrative capability regulations, the Department is proposing that an institution must “provide students, within 45 days of successful completion of other required coursework, geographically accessible clinical or externship opportunities related to and required for completion of the credential or licensure in a recognized occupation.” **PAEA is strongly concerned about the implications of this requirement.** Specific unintended consequences of this provision would likely include increased student costs associated with new clinical site payment arrangements particularly in urban health care settings, the disruption of existing rural training tracks critical to influencing the practice decisions of graduates, decreased student exposure to patients in underserved communities during their clinical training, and, ultimately, increased educational debt. **As such, we urge the Department to strike this requirement in its final rule and maintain the traditional role of programmatic accreditors in overseeing clinical training requirements for students.**

¹ PA Education Association. (2020). *By the Numbers: Program Report 35: Data from the 2019 Program Survey*. <https://paeasonline.org/wp-content/uploads/2020/11/program-report35-20201014.pdf>



PAEA appreciates the opportunity to offer its comments and looks forward to ongoing opportunities to engage with the Department to promote high-quality and affordable education for students. Should you have any questions or need additional information, please contact Senior Director of Government Relations Tyler Smith at tsmith@PAEAonline.org or at 703-667-4356.

Sincerely,

Linda Sekhon

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